

UK Modern Slavery Act (2015) *Statement 2023*

Contents

- **About Nationwide** page 3
 - Our Society
 - Our commitment
- **Detect and disrupt** page 4
 - Policies
 - Risk assessment and management
 - Due diligence
- **Raise awareness** page 9
 - Colleague training and awareness raising
 - Public and industry awareness raising
- **Support survivors** page 10
 - Vulnerability, access and inclusion
 - Survivor banking programme
 - Fundraising
- **Measurement and governance** page 12
 - Measuring effectiveness
 - Our governance
 - Statement review

The Modern Slavery Act 2015 (the Act) requires Nationwide Building Society to outline the steps taken in the previous financial year, to mitigate the risk of slavery or human trafficking taking place in its business, operations, or supply chain.

This statement is made in accordance with section 54 of the Act and applies to Nationwide Building Society (**Nationwide**) and its subsidiaries for the financial year ended 4 April 2023. This is the eighth such statement Nationwide has published.

Our Society

We are a UK-based building society, owned by our members (customers who have their current account, mortgage or savings with us). Our purpose-led strategy, centred around *Banking – but fairer, more rewarding, and for the good of society*, helps us do business in a responsible and sustainable way.

We focus on providing retail banking products and services to our customers, primarily mortgages, current accounts, and savings. We are the UK's second largest mortgage provider, one in ten of the UK's current accounts are with us (as per CACI's Current account and savings database, February 2023), and we look after almost £1 in every £10 saved in the UK.

We employ around 18,000 colleagues and have around 5,000 contingent workers (including contractors and temporary workers). Our headquarters are in Swindon and we have around 600 branches across the UK, the second-largest single-brand branch network in the country.

Nationwide works with approximately 1,100 third party suppliers, providing a range of goods and services. These include advertising, distribution, facilities management, insurance, IT hardware, software and support, print and mailing, professional services, recruitment, and more. We source mostly from companies based in the UK, but we have relationships across the globe.

Nationwide has several subsidiaries providing services as part of our wider business, including Derbyshire Home Loans Limited, E-Mex Home Funding Limited, Nationwide Syndications Limited, The Mortgage Works (UK) plc and UCB Home Loans Corporation Limited. A full list of our subsidiaries can be found on page 311 of our [Annual Report and Accounts](#).

Our subsidiaries rely on us for the infrastructure and resources they need to operate, including the goods and services, resources, and workforce. Each subsidiary's supply chains are, effectively, Nationwide's supply chains. In very limited circumstances, we may allow a subsidiary to identify and onboard a third party supplier independently, but we maintain oversight of the subsidiary's policies and processes and ensure there is an equivalent level of protection and governance.

Our commitment

As the world's largest building society, we can deliver mutual good to our customers in a way that others cannot. It is, therefore, part of our social purpose that we continue to take steps to help end modern slavery.

Modern slavery is a crime, and any benefits people get from those actions are the proceeds of crime. Nationwide is committed to fighting any type of economic crime, including modern slavery, throughout our retail business, our operations and our supply chain. We sever any ties with perpetrators as soon as victims are safe and law enforcement has been engaged. Within our supply chain, we check our suppliers have controls in place, and where they are identified as insufficient, we work with them to strengthen these controls and reduce the risk of modern slavery. If a supplier does not take the necessary actions in the agreed timeframe, we are prepared to terminate the relationship with them.

We have three focus areas when it comes to our anti-slavery approach: **Detect and disrupt** (pages 4 to 8), **Raise awareness** (page 9) and **Support survivors** (pages 10 to 11).

As a Society, we are committed to supporting the Ten Principles of the [United Nations \(UN\) Global Compact](#) in the areas of Human Rights, Labour, Environment and Anti-Corruption, which includes the elimination of forced and compulsory labour and the abolition of child labour. We are also a signatory to the UN Environment Programme Finance Initiative (UNEP FI) [Principles for Responsible Banking](#), a framework that supports alignment with the UN Sustainable Development Goals (SDGs) and the Paris Climate Agreement.

SDG 8, Decent Work and Economic Growth, includes taking immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking, and secure the prohibition and elimination of the worst forms of child labour. We have been working with [Finance Against Slavery and Trafficking \(FAST\)](#), [Justice & Care](#) and [TRIBE Freedom Foundation](#) to increase our awareness, understanding and reach, in support of survivors of modern slavery. We are also active members of various industry groups. These include the [Joint Anti-Money Laundering Intelligence Taskforce \(JMLIT\)](#) and the [UN Global Compact UK Modern Slavery Act Working Group](#).

About Nationwide **Detect and disrupt** Raise awareness Support survivors Measurement and governance

Policies

Our Nationwide policy framework includes, but is not limited to, the following policies and guidance:

Financial Crime Prevention Policy	Our principles and requirements for creating a Society-wide anti-economic crime culture to detect, deter and, where possible, prevent economic crime – including modern slavery. This is underpinned by a series of minimum control standards to manage our economic crime risks.
Code of Conduct Policy	States our zero-tolerance approach to modern slavery, for anyone working directly or indirectly for Nationwide (including contingent workers, contractors, or service providers). Supporting the Policy is our Anti-Slavery Standard & Guidance.
Whistleblowing Policy	Encourages individuals to raise any suspected wrongdoing or concerns with reassurance that they can do so without fear of negative consequences. Further guidance for suppliers can be found in the Whistleblowing Policy on our Supplier Policy Portal .
Resourcing Policy	Provides a structured and fair approach to the resourcing process and ensures consistency across the Society. This year, we added our alignment with the Employer Pays Principles to this policy, as detailed on page 5.
Third party Code of Practice	Outlines the minimum standards we expect our third party suppliers to uphold, including requirements related to ethical working practices and anti-slavery approaches. Our Third Party Code of Practice can be found on our Supplier Policy Portal .

Human Rights Statement

Our [Human Rights Statement](#), published in 2021, sets out our commitment to protect and support human rights throughout our organisation. Freedom from slavery and forced labour is a human right and this statement reaffirms our commitment to combatting this crime.

We are a Real Living Wage Employer

We are a Living Wage employer and a principal partner with the Living Wage Foundation. We ensure we pay the Real Living Wage to all who work on behalf of Nationwide, including employees, contingent workers, and on-site suppliers. We regularly review our pay levels, informed by external market movements and changes in living wage, and where necessary reflect any changes as soon as practicable.

We encourage our large suppliers to adopt the Prompt Payment Code through our Third Party Code of Practice and sustainability template questions for use in tenders.

Risk assessment and management

We do not tolerate modern slavery; however, we recognise the inherent risk we face by simply operating our business and working with third party suppliers, given the scale of the modern slavery problem in the UK and across the world. More on our controls to mitigate and manage the risk of modern slavery can be found on pages 5-8.

Our customers	As a financial services provider, there is a risk that our customers may be victims, perpetrators, or facilitators of modern slavery. We take this risk seriously and have a number of controls in place to mitigate this.	Page 5
Our people	Given our location and sector of operation, the risk of modern slavery taking place within our own operations is deemed low. The risk that our people are involved in modern slavery as a victim, perpetrator, or facilitator is mitigated through further controls.	Pages 5-6
Our supply chain	We are committed to working with our third parties to mitigate modern slavery risk. We have a number of controls in place at all stages of our relationship with third parties, from supplier selection, to onboarding, to ongoing monitoring of sustainability performance. We reassess third party modern slavery risk annually, as described on page 7. Enhanced monitoring is also conducted within certain higher risk areas of our supply chain. For material third parties, we conduct due diligence on subcontractors.	Pages 6-8
Our ventures	With most of our portfolio companies at an early stage in their lifecycle, and because of the nature of the markets and industries within which they operate, we consider the risk of links to modern slavery to be low. However, we keep this risk under review.	Page 8

Due diligence

Our customers

As a building society, we focus on providing banking products and services to our customers. We are the world's largest building society with over 17 million customers, 16 million of whom are members (those who have their mortgage, current account or savings with us).

Economic crime

Nationwide takes its obligations and responsibilities to reduce the risk of it being used to facilitate economic crime seriously. Accordingly, it operates a framework of controls, which is supported by a suite of policies, control standards and procedures.

Nationwide reviews its policies and standards to ensure that new legislation and industry guidance are incorporated to support critical controls and procedures to mitigate Economic Crime and Anti-Corruption. We conduct transaction monitoring on customers, looking for behaviours and patterns of transactions linked to specific high-risk factors relating to human trafficking and modern slavery. We will report cases where a suspicion has been identified.

We participate in several external partnerships and working groups focusing on human trafficking, modern slavery, and organised immigration crime (see page 3). This engagement enables us to better understand the activities and behaviours which might suggest that customers are involved in modern slavery or human trafficking, either as a perpetrator or victim. Engaging with others also deepens our understanding of the threat that modern slavery and human trafficking poses to us and our customers. It has also enabled us to contribute to numerous successes, safeguarding people who have been victims of modern slavery and facilitating the arrest and conviction of criminal gangs.

Our people

Nationwide employs around 18,000 employees and utilises the services of over 5,000 contingent workers (including contractors and temporary

workers). Senior leaders and managers are expected to embed inclusion and diversity in their work (as part of their people leader goals), to make sure people and talent-related decisions and processes are inclusive and fair, and bias is minimised. We have updated our ways of working to enable us to help each other to develop, grow, and be the best we can be so our customers can depend on us getting it right, no matter what they are going through.

Employee vetting

As part of our due diligence, all our people go through a vetting process during recruitment, which includes assurance that they have the right to work in the UK. We undertake face-to-face and virtual interviews (depending on the role and location), and Right to Work checks are carried out in line with Home Office guidelines. All verbal and written offers of employment, plus confirmation of start dates, are subject to candidates providing all required permissions, information, and documentary evidence.

Any discrepancies identified during the screening of our candidates are reviewed on an individual basis, with the relevant evidence required to make an informed and risk-based decision to ensure the successful completion of all pre-employment screening checks. All pre-employment screening is conducted by Security Watchdog, our third party supplier. When engaging contingent workers, we require complete background checks prior to hire, consistent with the approach taken for our employees, before access is provided to our sites, systems, or data.

Responsible recruitment

Our Resourcing Policy prohibits recruitment fees, and states: 'Nationwide recognises the risk of bondage arising from the use of recruitment fees and will never ask job applicants to pay recruitment costs, at any point in the recruitment process. Where migrant labour is used, recruitment suppliers and Nationwide should pay for all recruitment-related fees and costs (with the exception of personal visa costs), in line with the Institute of Human Rights and Business' [Employer Pays Principles](#) and the International Labour Organization's [Definition on recruitment fees and costs.](#)'

Due diligence (continued)

Permanent hiring is normally managed through our strategic recruitment partner, Lorien, who are members of the [Recruitment & Employment Confederation \(REC\)](#) and adhere to the principle that: 'Members recruiting from outside the UK must not use overseas agents who charge for their services, unless that is the legal and normal custom and practice sanctioned by the government of the country of origin. In addition, members must make all reasonable efforts to ascertain such information about any agents used and should be able to demonstrate that they have done so.'

If the requirement for contingent resource is identified, then the business must only use approved third party suppliers to support this recruitment. Working with Alexander Mann Solutions Resourcing Team (AMS), roles will be advertised externally and AMS utilise their own supply chain for contingent vacancies (where needed). AMS will only engage with suppliers who comply with their Code of Conduct, are subject to due diligence and sign up to their contractual terms and conditions that prohibit any form of modern slavery in the provision of resource.

Supply chain due diligence and contractual arrangements with our two key strategic partners help to reduce any risk of modern slavery and human trafficking.

Speak up

We actively encourage our colleagues to speak up and raise concerns, including suspicions of modern slavery, as outlined in our policy described on page 4. All employees and contingent workers complete a mandatory annual 'Speak Up' e-learning on our whistleblowing procedures. There is also an independent Trade Union, the [Nationwide Group Staff Union \(NGSU\)](#), which helps us make sure we are supporting and protecting our colleagues and provides additional ways for our colleagues to raise concerns.

Our supply chain

Our third party suppliers are organisations that support us in operating our business. They provide goods and services enabling us to serve our customers' needs. We have around 1,100 third party suppliers, defined as

those we have direct relationships with. We are committed to working with our third parties to mitigate modern slavery risk.

Onboarding due diligence

When a potential supplier registers with our procurement system, they are asked responsible business questions, which include attestation to comply with our [Third Party Code of Practice](#) and whether they have produced a compliant statement under the UK Modern Slavery Act. If either question is answered negatively, the Responsible Business team is triggered to review and investigate. If, upon investigation, the supplier is found to not meet the standards laid out in our Code or requirements of the Act when obligated, our Procurement team will seek to negotiate a schedule which requires the supplier to close the gaps in a defined timeframe in order to work with us. Should the supplier refuse, Nationwide's Chief Procurement Officer will determine if there are grounds for dispensation; for example, if the supplier is being used for a low-value, one-time order or if there is no alternative supply option.

For the 2022/23 financial year, 96% of new suppliers that underwent onboarding due diligence attested to meeting the requirements of our Code relevant to their company size. Of the remaining 4%, which consisted of eight suppliers, one had not published its latest year's Modern Slavery Act Statement and so closing this gap was agreed; the supplier has since published its latest statement and resolved this issue. The gaps for the remaining seven did not relate to modern slavery (they were instead related to emissions monitoring).

Supplier selection

We have a standard set of responsible business questions for use within tenders. These questions cover topics including, but not limited to, anti-slavery governance, anti-slavery training, real Living Wages, EcoVadis and the UN Global Compact. They are tailored depending on the company size. In Autumn 2022, we launched a minimum weighting of 10% on responsible business questions in all Requests for Proposal (RFP) evaluations.

Due diligence (continued)

Contracting

Our standard form agreements include provisions relating to ethical trading and tackling modern slavery. The contractual terms we seek to agree with our third party suppliers require that they comply with our Third Party Code of Practice, take steps to monitor their own operations and supplier networks for modern slavery, and to report as necessary. For large third party suppliers, this means meeting their own obligations under the UK Modern Slavery Act.

Our terms provide that Nationwide will work in support of a third party in tackling instances of modern slavery that they may uncover, rather than simply ceasing to work with them. We believe that this approach, where companies are encouraged to actively seek out and resolve any instance of modern slavery in their business or supply chain without the fear of losing Nationwide's business, is consistent with the approach that the Act promotes.

Ongoing monitoring

Nationwide works with [EcoVadis](#), an international sustainability ratings provider, to continually risk assess and manage third party supplier sustainability performance. The EcoVadis assessment includes a module on human and labour rights, with questions relating to modern slavery, as well as a module on sustainable procurement with questions relating to how social standards are checked throughout the supply chain. We have been onboarding existing third party suppliers onto the EcoVadis platform gradually since Spring 2021, prioritising those relationships that are considered material, higher spend, higher contribution to our supply chain emissions, or higher risk from a labour abuse or modern slavery perspective.

2022 calendar year	Overall	Human & Labour Rights	Sustainable Procurement
Average score for Nationwide third parties (%)	59.6	60.1	50.8
Average score across the entire EcoVadis network (%)	45.2	47.9	37.2

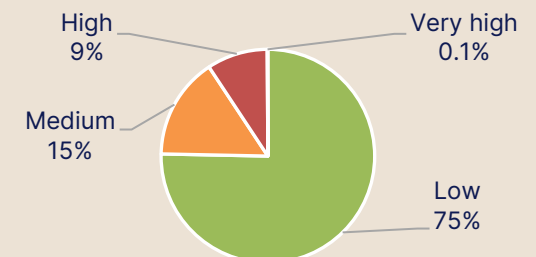
As of April 2023, 206 third party suppliers had been requested to join EcoVadis. 142 third parties, representing around 70% of total procurement spend, had valid scorecards. Of these, 16 third parties had an overall score below Nationwide's performance benchmark of 45%, and improvement and reassessment within 12 months has been requested. A further 11 third parties had scored below 45% in their previous assessment, but had already improved and received updated EcoVadis ratings above this benchmark. 45% is the minimum for a supplier's sustainability performance to be considered as 'Good', per the [EcoVadis scoring scale](#), is therefore why we set it as our performance benchmark.

We refresh our assessment of third party modern slavery risk on an annual basis using external data sources, such as the latest Trafficking in Persons report, Gangmasters and Labour Abuse Authority (GLAA) industry profiles, Know The Chain benchmarks, Unseen insights and UN Global Compact high risk sectors. We assign an overall modern slavery risk rating to each third party by averaging country, category and spend risk ratings, with a higher weighting applied to categories which we believe to be the leading indicator. For the financial year ending April 2023, 1 supplier (0.1% of our total supplier base) was considered very high risk and 96 suppliers (9%) high risk.

Third parties identified as high and very high risk in this annual assessment are reviewed and if we expect to continue spending more than a designated spend threshold annually, we will request they complete the annual EcoVadis sustainability assessment. As at April 2023, 25% of these had valid scorecards, 7% had expired scorecards being refreshed and 3% were completing the assessment for the first time. The remaining 65% were being reviewed to determine if they were in scope for ongoing EcoVadis assessment requests. There is a cost to suppliers for completing the EcoVadis assessment, so we aim to make sure our requests are fair and proportionate to our relationship.

Third party modern slavery risk ratings

This shows the proportion of our suppliers assigned each of the modern slavery risk ratings, based on our annual assessment, for the financial year ending April 2023.



Due diligence (continued)

In addition, Nationwide conducts regular evidence-based testing of third party compliance with the [Third Party Code of Practice](#), for material third parties or those that support platinum or gold business lines. This includes that they have policies covering the requirements of the Ethical Trading Initiative (ETI) Base Code (such as no use of forced or child labour) and operate a clear grievance procedure to tackle bullying, discrimination, harassment and abuse.

During the financial year, 15 third parties were tested on their compliance. Nine evidenced all core requirements within the Code that were relative to their company size, and non-conformances were found across six third parties. Non-conformances related to insufficient policy documentation covering some elements of the ETI Base Code or lack of evidence on employee health and safety training. Remediating actions have been requested and will be followed up in the next annual controls test.

Complex supply chains with subcontracting present the greatest risk, due to the reduction in visibility, traceability, and transparency sometimes in play. For material third parties, we conduct due diligence on subcontractors, including screening for adverse media, sanctions, and politically exposed persons.

Enhanced monitoring is conducted within certain higher risk areas of our supply chain. An example is uniforms for branch colleagues. As part of our contractual agreement with our uniform supplier, they are required to ensure Sedex Members Ethical Trade Audits (SMETA) are conducted annually at each factory they contract to manufacture the garments. SMETA is Sedex's social auditing methodology that assesses a site and whether it meets the standards of the ETI's Base Code and local laws. An independent auditor inspects the site, reviews documentation and procedures, and interviews workers and factory management. The auditor produces a report which outlines whether any element of the ETI Base Code appears to have been breached and, if so, the corrective action required, as well as highlighting any positive practices.

We review the results from each audit, and whether non-conformances have been closed, on a monthly basis. Performance forms part of the uniform team's monthly scorecard.

Some of the changes we have implemented this year include:

- Increasing coverage of third parties with valid EcoVadis scorecards from 40% of our total procurement spend to 70%
- Launching a 10% minimum weighting on responsible business questions within all Requests for Proposals (RFPs), including for standard questions on anti-slavery governance and training
- Providing training to colleagues with procurement and third party management responsibilities, on responsible purchasing practices that support upholding human and labour rights across the supply chain. Further detail can be found on page 9.

Our ventures

Through our subsidiary, NBS Ventures Limited, we establish relationships with early-stage fintech teams who are developing solutions that could benefit our customers or society as a whole. NBS Ventures undertakes our investment activity and manages a limited portfolio of companies.

We conduct due diligence on potential fintech candidates for investment. All portfolio companies go through the same Nationwide procurement process, with its incumbent requirements, as the rest of our supply chain.

This year we developed an environmental, social and governance (ESG) due diligence questionnaire, which includes questions around modern slavery and human trafficking, and will be sent out annually to our portfolio companies. We will provide support to companies not meeting our requirements, or seeking to further develop their own responses to modern slavery risk.

Colleague training and awareness raising

All colleagues are requested to undertake annual, mandatory training courses across several topics, including two economic crime e-learning modules, which include how to identify and escalate suspicions of modern slavery and human trafficking. Colleagues also undertake an annual e-learning module on speaking up and whistleblowing. We also provide training to all our customer-facing colleagues on vulnerability, including vulnerabilities that could be relevant to a survivor of modern slavery, as described further on page 10.

We provide guidance to all Nationwide employees to help them report any suspicions or knowledge of money laundering, terrorist financing and any suspected criminal offences that generate the proceeds of crime such as modern slavery and human trafficking. Any offences involving any perceived customer vulnerability, including modern slavery offences, are prioritised. Training on how to purchase responsibly is also available on our employee learning platform, which supports self-led learning, and has been completed by 96% of our Procurement team.

At the end of 2022/23, we launched a new training course available to all colleagues, as an introduction to modern slavery and human trafficking. It was created specifically for the finance sector by Themis, a purpose-driven business that aims to reduce the global impact of financial crime. It was developed in partnership with the UK Independent Anti-Slavery Commissioner and the UK Modern Slavery Training Delivery Group, a UK government initiative, and is accredited by the London Institute of Banking and Finance.

Through Society-wide training and transaction monitoring, we are able to identify potential victims and perpetrators. Our colleagues have benefitted from the training, and when combined with local knowledge, they have successfully identified and reported suspicious behaviour related to modern slavery and human trafficking, which has been escalated to the National Crime Agency in many cases. By continually developing and enhancing our training activity, we will further improve identification across the Society.

Public and industry awareness raising

In May 2022, our Chief Procurement Officer spoke about our Procurement for Mutual Good programme at the Chartered Institute of Procurement & Supply Sustainable Procurement Summit, as part of a presentation on creating a culture for sustainability. This included explaining our efforts to address modern slavery risk, and how it connects with our Mutual Good Commitments and the United Nations Sustainable Development Goals.

Further to this, we have continued to engage with industry groups as detailed in the 'Our commitment' section on page 3.



Vulnerability, Access and Inclusion

We understand that survivors of modern slavery may not always be able to open some accounts, have trust in financial institutions, or understand what banking services are available to them. This can inhibit their financial independence and leave them vulnerable to further exploitation. To combat this, and to help avoid foreseeable harm to these customers, we have delivered training to our customer-facing colleagues on customer vulnerability. This includes vulnerabilities that could be relevant to a survivor of modern slavery, such as reduced financial resilience, confidence or capability, difficult circumstances, and poor health. The training highlights how to identify vulnerability, respond to it with empathy and what our colleagues can do to help.

We also have a vulnerability, access and inclusion library with various toolkits and guidance on supporting vulnerable customers, including example conversation starters, advice on tone of voice, and language for sensitive situations.

In addition, we are aware that due to past experiences, not everyone will have the standard identity documentation to open one of our current accounts. This is why we offer a FlexBasic account, our basic bank account, to enable everyone to have access to banking services to support their financial independence. We are the third largest provider of such an account in the UK.

Survivor banking programme

As a provider of retail financial services, it is important that we understand and try to overcome some of the many barriers that those who have escaped slavery encounter when trying to regain control of their lives. Access to a bank account, an understanding of basic finances, and the ability to build financial resilience and empowerment are key to this.

We continue to build our skills, knowledge and processes that support this path to financial independence. In October 2022, we attended the TRIBE Survivor Financial Empowerment launch. We have also been working with Finance Against Slavery and Trafficking (FAST), and survivor support organisations Justice & Care and Unseen, to continue to enhance our understanding of survivor needs and vulnerabilities. This insight is helping us to build a greater level of support and consideration into our survivor banking programme, including a clearer referral process with a dedicated Nationwide contact. For Nationwide, this has the benefit of consolidating expertise and learnings, and for the charity and survivor, this removes the potential pain of multiple hand-offs or the need to repeat their specific needs and requirements. We want to continue to build relationships with more survivor support organisations, which will increase the number of referrals we receive, and help us continue to understand and respond to the needs of this vulnerable group of people.

As we evolve our survivor banking programme, we continue to realise the gains, importance and rich learnings of uniting teams from across the organisation to understand and combine our collective objectives and increase the impact of our combined efforts. This includes tapping into more of the rich intelligence that is obtained through transaction monitoring, and using it to not only respond to suspicions of criminal activity, but to have a greater understanding of where our customers are vulnerable or at risk. This includes building an understanding of individual needs and circumstances, that may need to be referred to our Specialist Customer Support team.

Survivor banking programme (continued)

Our Specialist Customer Support team plays a valuable role in helping customers with additional needs. The team have received a specialist level of vulnerability training in conjunction with Money Advice Trust.

We recognise, however, a key feature of building financial independence is to try to ensure that survivors can participate seamlessly in everyday banking. To help with this, we offer opportunities to build know-how around basic finances, through a combination of [in-person and online sessions](#). Over the year, these included education on how to recognise scams, and how to use our internet bank and banking app safely, as well as our Money Matters webcasts that provided practical help with managing money. We also have [online banking demos](#) on how to get set up online, make payments and manage cards, keep accounts secure and change personal details.

Fundraising

We donate at least 1% of our pre-tax profits each year to charitable activities. This money is split between our own social investment programmes, focused on helping people to have a place fit to call home, and The Nationwide Foundation, whose vision is for everyone in the UK to have access to a decent home that they can afford.

Significant components of our social investment agenda are the Community and Colleague Grant programmes and funding our long-term partnership with Shelter. For more than twenty years, we have been supporting Shelter in their fight to end the housing shortage in the UK. We recognise that homelessness and modern slavery are often interlinked. People experiencing homelessness are extremely vulnerable to modern slavery, with criminals targeting them for exploitation. Research by Project TILI found the most common living situations before a person was exploited in England, Wales, or Northern Ireland were rough sleeping and sofa surfing. By supporting Shelter, and through our grants programmes, we hope to combat both modern slavery and homelessness.

Supporting TRIBE Freedom Foundation with a colleague grant

Each year, through our Colleague Grants programme, we ask our colleagues to nominate UK charities to award grants to, as we seek to support the communities that we operate in. This year, our Colleague Grants programme awarded over £580,000 to 71 registered charities.

Through this programme, in 2022/23, we were proud to award a £10,000 grant to [TRIBE Freedom Foundation](#) for the second consecutive year. These funds will go towards expanding their community of anti-slavery advocates and the TRIBE Survivor Financial Empowerment Hub. Our grant in 2021/22 contributed towards their support for the charity Ella's, in opening a new survivor safehouse – aiming to increase their accommodation capacity by 50%.



Measuring effectiveness

Key Performance Indicators	2022/23	2021/22	2020/21	2019/20
Percentage of colleagues completing Anti-Bribery and Corruption e-learning	98%	96%	96%	-
Percentage of colleagues completing Economic Crime e-learning	99%	98%	98%	96%
Percentage of colleagues completing Speak Up e-learning	98%	96%	93%	83%
Percentage of Procurement colleagues completing tailored training with anti-slavery content	96%	90%	92%	-
Number of third party suppliers onboarded onto EcoVadis (valid scorecard or submitted response)	142	95	-	-
Average overall EcoVadis performance of onboarded third parties (2022 calendar year)	59.6%	58.5%	-	-
EcoVadis network average performance across 90,000+ companies assessed (2022 calendar year)	45.2%	44.4%	-	-

Our governance

The **Board** and **Executive Committee** have oversight of the Society's approach to combatting modern slavery through their annual review and approval of our statement. A cross-functional **UK Modern Slavery Act Statement Working Group** was formed to produce the statement. We also took into consideration peer feedback and recommendations gathered as part of our participation in the UN Global Compact UK Modern Slavery Act Working Group.

This Statement was also reviewed by the **Responsible Business Committee**. The Responsible Business Committee is accountable for managing Nationwide's responsible business agenda and is chaired by the Director of Strategy, Performance and Sustainability. Matters are escalated to the Executive Committee as appropriate.

Statement review

This statement has been approved by the Board of Nationwide on behalf of Nationwide and each of its subsidiaries on 18 July 2023 and is signed by:



Debbie Crosbie
(CEO)



Kevin Parry
(Chairman)