

# Nationwide Building Society

Slavery and Human Trafficking Statement 2016



Building Society

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This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 (the Act) and sets out the steps that Nationwide has taken to ensure that slavery and human trafficking is not taking place in its supply chains or any parts of its business.

# Nationwide's business

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Nationwide is the United Kingdom's largest building society with around 700 branches and 15 million customers. It is one of the largest savings providers and a top-two provider of mortgages in the UK. In 2016 Nationwide was also named the third Best Big Company to Work for in the UK by Best Companies.

Nationwide is a mutual and, as such, is owned by its members. In addition to the branch network Nationwide has over 20 operational sites across the UK with its headquarters based in Swindon.

Nationwide is a strong, sustainable and trusted organisation which is focused on doing the right thing for its customers and the communities in which they live.

The Society is proud to be an accredited Living Wage Employer and pay its employees and those suppliers who work on site the voluntary Living Wage. Achieving this accreditation required some key suppliers working collaboratively with Nationwide to adjust internal policies to comply with the standards. Nationwide was also the first high street name to become a Principle Partner of the Living Wage Foundation, sitting on its Advisory Council.

As part of its collaborative approach to treating employees fairly, Nationwide formally recognises a fully independent union, the Nationwide Group Staff Union. The relationship provides effective independent challenge and feedback through a range of employee involvement committees, which operate at all levels of the business.



# Nationwide's policies on slavery and human trafficking

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Nationwide operates policies which reflect its commitment to acting ethically and with integrity in business relationships, designing and implementing controls to ensure slavery and human trafficking should not take place anywhere in its supply chains.

The Society continually evaluates business practices to ensure high standards of business behaviour and social responsibility are exceeded. The supplier code of practice, along with Nationwide's PRIDE behaviours, promotes fairness and dignity for the people involved in the business. This includes the products, goods and services provided by suppliers through their supply chain.

It is important to Nationwide that all suppliers represent the Society in a manner that reflects its focus on doing the right thing for customers, employees and stakeholders.

Nationwide asks all suppliers to adhere to the supplier code of practice, which includes human rights standards relating to forced or involuntary labour, human trafficking, child labour, working hours, wages and benefits, freedom of association, harassment and bullying. The Ethical Suppliers Forum continues to monitor compliance with the supplier code of practice.



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# Supply chain risk

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As Nationwide is not in an industry with a high risk of modern day slavery, a risk based approach has been adopted to review supply chains that fall within industries that carry a higher risk of modern day slavery. Nationwide are seeking further assurance that suppliers are adhering to the supplier code of practice through completion of a self-assessment in relation to their supply chain. Instances of non-compliance would be considered a breach of the supplier code of conduct, wider policies and/or supplier standards.

In addition, where suppliers are required to make their own statements in accordance with the Act, Nationwide will monitor the content of the statements published.

In 2013/14, Nationwide established an Ethical Supplier Forum which brings together some of its biggest partners to share best practices around engagement in citizenship and ethical practices.

# Due diligence processes for slavery and human trafficking

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As part of Nationwide's initiative to identify and mitigate risk, the Society carries out appropriate due diligence when engaging and working with suppliers, whilst also ensuring that the work undertaken is proportionate to the services to be provided and the risk involved.

# Training

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Nationwide provides relevant training and career development for all employees. Managers receive further support that includes training and line manager guidance to ensure consistency on the application of recruitment processes, management of suppliers and policies on fair treatment at work and equality and diversity.

Nationwide will be providing additional training on the requirements of the Act to all relevant supplier managers.