

# Environmental, Social and Governance Disclosures 2025

Supplemented by our:

- Climate-related Financial Disclosures 2025

# Welcome

We are committed to operating in a socially responsible way, as we deliver on our purpose of Banking - but fairer, more rewarding, and for the good of society.

This was a significant year for Nationwide, as we completed our acquisition of Virgin Money in October 2024. As well as enabling us to grow our business significantly, we have brought a previously shareholder-owned bank into our mutual group. This means we can bring the benefits of mutuality to more people in the UK, providing them with further value through a wider range of products, propositions and services.

Our Environmental, Social and Governance (ESG) Disclosures 2025 describe our ESG ambitions and performance over the 2024/25 financial year. Our ESG datasheet summarises our key ESG measures.

Our disclosures are structured around our five Mutual Good Commitments, which articulate our ESG ambitions and are set in areas where we believe we can make the most significant, positive impacts for our members and customers, our communities and society as a whole.

The ESG Disclosures 2025 are part of our annual reporting suite, and are complemented by our:

- [ESG datasheet 2025](#)
- [Annual Report and Accounts 2025](#)
- [Climate-related Financial Disclosures 2025](#)
- [Intermediate \(by 2030\) net zero aligned Transition Plan 2023](#)
- [Principles for Responsible Banking report 2025](#)
- [Modern Slavery Act Statement](#)
- [Gender and ethnicity pay gaps reviews \(Nationwide sub-group, Virgin Money\)](#)
- [Our policies and statements](#)

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### Terms used in this report

|                                              |                                                                                                      |
|----------------------------------------------|------------------------------------------------------------------------------------------------------|
| <b>Nationwide / the Group</b>                | Nationwide Building Society and all consolidated subsidiaries, including Virgin Money sub-group.     |
| <b>Nationwide sub-group</b>                  | Nationwide Building Society and its consolidated subsidiaries, excluding the Virgin Money sub-group. |
| <b>Virgin Money / Virgin Money sub-group</b> | Virgin Money UK PLC and its consolidated subsidiaries.                                               |

### Basis of preparation

The year end date of Nationwide has been changed to 31 March, which aligns with that of its subsidiary undertakings including Virgin Money. Where reference is made to the 'year ended' 31 March 2025, this represents the 361-day period from 5 April 2024 to 31 March 2025, unless otherwise stated. On 1 October 2024, the Group acquired Virgin Money UK PLC. The results of Virgin Money are included for the period from 1 October 2024 to 31 March 2025, unless otherwise stated.

# What we have achieved this year

We have continued to deliver on our purpose, and grow and strengthen our business, including through our acquisition of Virgin Money.

**Extended our Branch Promise** to include Virgin Money branches – we promise to keep every one of our branches open until at least the start of 2028<sup>1</sup>

Helped **120,000 first time buyers**<sup>2</sup> into a home of their own

2024: 64,000

More than **£20 million committed to charitable activities**<sup>3</sup>

2024: £15.5 million

**Reduced the direct emissions**<sup>4</sup> from our business operations by 21% in 2024/25

**Highest ranked UK high street financial services provider** in the Financial Times Diversity Leaders in Europe list, for the fourth year running<sup>5</sup>

**Extended our Helping Hand mortgage** to enable first time buyers to borrow up to six times (previously 5.5x times) their income, up to 33% more than the maximum borrowing available on our other standard mortgage products

**Continued to source 100% renewable electricity**

Delivered **£825 million of social housing lending**

2024: £1,323 million

Helped **around 55,000 young people** with financial knowledge through Nationwide Money Lessons and Virgin Money's Make £5 Grow programme<sup>6</sup>

**Supported more than 65,000 people** through Nationwide Fairer Futures – our new social impact programme

**Supported around 1,300 people in data poverty with internet access** through our National Databank programme, helping to tackle digital poverty

Commenced an assessment based on **the Taskforce on Nature-related Financial Disclosure's (TNFD) LEAP approach**<sup>7</sup> to understand the nature-related risks across our business operations and supply chain

<sup>1</sup>All our 605 Nationwide branches and 91 Virgin Money branches will remain open until at least 1 January 2028. Opening hours may vary. There may be exceptional circumstances outside of our control that mean we have to close a branch, but we will only do this if we do not have another workable option.

<sup>2</sup>Our definition of a first-time buyer is set out in the Glossary on page 66.

<sup>3</sup>Includes £18.7 million as part of Nationwide's commitment to donate at least 1% of pre-tax profits each year to good causes, as well as donations made by Virgin Money (see page 21). The £18.7 million included £17.0 million of charitable donations and £1.7 million relating to supporting activity and staff costs of the business.

<sup>4</sup>Our scope 1 emissions have been combined across the Group. For 2024/25, data is provided for year to 31 December 2024 for the Nationwide sub-group and year to 30 June 2024 for Virgin Money. Scope 1 CO<sub>2</sub> emissions reduced by 45% compared to our 2021/22 baseline. More information can be found on page 24 of our Climate-related Financial Disclosures 2025.

<sup>5</sup>The FT-Statista [ranking of Europe's Diversity Leaders](#) is based on independent surveys of more than 100,000 employees across Europe, on their perceptions of their organisation's diversity and inclusion practices. Surveys were conducted in the period from April to July 2024. Employee surveys accounted for 70% of the final score, and three indicators accounted for 30% of the score (the share of women in management positions, the communications made in favour of diversity, and a diversity score calculated by data provider Denominator).

<sup>6</sup>The number of people supported through Nationwide's Money Lessons reflects the period between January 2025, when the programme re-launched, and March 2025. For Virgin Money Make £5 Grow programme, the period covers October 2024 to March 2025. For more information on these programmes, see page 14.

<sup>7</sup>The LEAP approach (Locate, Evaluate, Assess and Prepare) is a framework designed by the TNFD to help identify, assess, manage, and disclose nature-related risks. For more information on our approach to nature-related risk, see page 34.

# An introduction from Debbie Crosbie DBE, Group Chief Executive Officer

We have had an outstanding year. We returned a record £2.8 billion in value to our members, and continued to invest in customer experience, increasing our lead over peers for customer satisfaction<sup>8</sup>. We were also first among our peer group when consumers rated the brands that they had 'heard good things about'<sup>9</sup>. The progress we made towards our strategy resulted in a strong financial performance, as detailed in our Annual Report and Accounts 2025.

I am especially pleased that we are now attracting more younger customers, particularly to our mortgages and current accounts. We continue to increase the accessibility of home ownership for first time buyers, including through our Helping Hand mortgage proposition, and became first choice for first time buyers in the UK<sup>10</sup>.

We attracted a record number of students, with over 1 in 4 new student account openings in the market<sup>11</sup>. I was also delighted that we played a part in the inaugural UK Youth Poll<sup>12</sup>, enabling young people to share their views and experiences, and helping us to understand better what they need.

Our acquisition of Virgin Money has enabled us to significantly grow our business and we can bring the benefits of mutuality to more people in the UK. This includes providing a wider range of products, propositions and services, including business banking, which we intend to offer to more customers across the Group over time.

We are investing to improve Virgin Money's customer service and systems so we can fully realise its potential in the years ahead, particularly from its strong credit card and business banking services.

We continue to provide customers with choice in the way they bank with us. Branches remain incredibly important to our customers, and we extended our Branch Promise to include Virgin Money branches. We are also investing in our digital services and added over 30 new features and improvements across the Nationwide and Virgin Money personal banking apps.

We are working hard to support our customers' financial wellbeing. Nationwide received the 'Advanced' accreditation from the Money and Mental Health Policy Institute (MMHPI), recognising the accessibility of our services for people living with mental health challenges. We provided safe spaces in over 430 Nationwide branches and introduced a safe call back process, to support people experiencing domestic abuse.

We are making a real difference in communities and committed more than £20 million to charitable causes. We launched Nationwide Fairer Futures, to help tackle some of the biggest issues in society today – youth homelessness, families living in poverty, and the challenges of dementia. Our funding towards Centrepoint's More Than a Roof programme and Action for Children's Family Fund is creating positive impact, and the Dementia UK clinics that

we introduced in local branches have been incredibly well received. Recently, we also committed to funding specialist research through The Royal Marsden Cancer Charity.

Through our Virgin Money branches, we are rolling out the National Databank programme, distributing free, data-loaded mobile SIM cards to enable internet access for those impacted by data poverty. We are also providing financial education to school children across the UK through Nationwide's Money Lessons and Virgin Money's Make £5 Grow programmes.

We will continue to identify opportunities to strengthen the Group's activities, making a positive difference for our customers, colleagues, communities and the environment, and delivering on our purpose: Banking – but fairer, more rewarding, and for the good of society.



## Dame Debbie Crosbie DBE

Group Chief Executive Officer

<sup>8</sup>Nationwide brand lead as at March 2025: 7.5%pts, March 2024: 5.5%pts. © Ipsos 2025, Financial Research Survey (FRS), for the 12 months ended 31 March 2023 to 12 months ended 31 March 2025. For more information, see footnote 42 on page 16.

<sup>9</sup>Based on a study conducted by an international market research company commissioned by Nationwide. Based on non-customer responses for the 12 months ended March 2025. Financial brands included are Nationwide, Barclays, Chase, Co-operative Bank, First Direct, Halifax, HSBC, Lloyds, Monzo, NatWest, Santander, Starling Bank, TSB and Virgin Money.

<sup>10</sup>Based on the number of residential first time buyer mortgage completions in the UK by banking brand, between April 2024 and March 2025. Provided by CACI Ltd Mortgage Market database.

<sup>11</sup>Based on Curinos eBenchmarkers comparison of financial services providers and Nationwide analysis, April 2024 to February 2025.

<sup>12</sup>UK Youth Poll 2025

# Our difference is our mutual ownership model

## Our purpose

Banking –  
but fairer,  
more rewarding,  
and for the  
good of society.

The combination of our scale, mutual model and strong reputation puts us in a unique position in UK financial services. It enables us to prioritise customer experience and value, whilst having a positive impact on wider society and growing our business to bring the benefits of mutuality to more people.

## Our business model

As a mutual, we are owned by our members – our customers with a Nationwide-branded current account, mortgage or savings.

Unlike our banking peers, we do not have to pay shareholders dividends. The value we create is used to benefit our members, as owners.

We aim to deliver value for our members, including through our leading service, member-exclusive products and our Nationwide Fairer Share Payments.

We deliver our retail banking products and services to our customers by helping them with:

- managing everyday finances – more than one in nine<sup>13</sup> of the UK's current accounts are held with us
- owning a home – we are the UK's second<sup>14</sup> largest mortgage provider
- saving for the future – we are the UK's second<sup>14</sup> largest provider of retail deposits.

We also offer other retail products, including credit cards, personal loans and insurance. And we support landlords, through our buy to let business, The Mortgage Works, and through Virgin Money.

Our acquisition of Virgin Money on 1 October 2024 has broadened our product range to include Virgin Money's business banking services, which we intend to offer to more customers across the Group over time. Our business customer portfolio primarily comprises small and medium-sized enterprises (SMEs).

In total, over 60% of our funding comes from our customers, and over 85% of our lending is secured on residential property.

## Our strategy

We have four strategic drivers that help us to fulfil our purpose. They are:

- Simply brilliant experience
- More rewarding relationships
- Beacon for mutual good
- Simplify, integrate and grow

**More information on our four strategic drivers, and our progress towards them, can be found on pages 12 to 15 of our Annual Report and Accounts 2025.**

<sup>13</sup>CACI's Current Account and Savings Database, Stock (February 2025).

<sup>14</sup>Based on internal analysis of company financial reports.

# Our Environmental, Social and Governance (ESG) ambitions

Our ESG ambitions are embedded within our strategy and are articulated through a set of five Mutual Good Commitments. These are focused in areas where we believe we can make the most significant, positive impacts for our members and customers, our communities and society as a whole.

Our Mutual Good Commitments span across three of our four strategic drivers and demonstrate how our business aligns to, and supports, the UN Sustainable Development Goals (SDGs) and our net-zero ambitions. Our Mutual Good Commitments are overseen by Nationwide's Board and Executive Committee. The Strategy section of this report (pages 9 to 38) demonstrates our progress against these commitments, and more detailed information on the metrics that support these commitments is set out in the Metrics and targets section (pages 59 to 64).

## The strategic drivers that our mutual good commitments sit within

|                                                                                                                                                                                                                  |                                                                                                                                                                                                                        |                                                                                                                                                                                                                                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  <b>Simply brilliant experience</b><br>Collaborating to deliver a personal, seamless and easy experience, from start to finish. |  <b>More rewarding relationships</b><br>Building deeper, broader, more lifelong relationships that provide the best value in banking. |  <b>Beacon for mutual good</b><br>Focusing our impact on the issues that matter most to customers, businesses and society, in a way that only we can. |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Our mutual good commitments

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| 1. We will offer customers a choice in how they bank with us, and support their financial resilience.<br><br>We seek to support our customers in building their financial resilience and recognise the financial security this can bring them in the longer-term. We support them in developing good savings habits and helping them become more financially confident in managing their money.<br><br>We are committed to supporting financial inclusion and the financial wellbeing of all our customers, including those in vulnerable circumstances, and we have a range of initiatives in place to achieve this.<br><br>Read more on pages 10 to 17. | 2. We will help more people into safe and secure homes, both our customers who have relationships with us and more broadly.<br><br>As the second largest mortgage provider in the UK, we are uniquely placed to drive positive change and help people into safe and secure homes. We help all our mortgage customers, but provide targeted support to: <ul style="list-style-type: none"> <li>• Help first time buyers into home ownership</li> <li>• Enable quality homes for those who rent</li> <li>• Enable the provision of affordable housing through our lending to the social housing sector.</li> </ul> Read more on pages 18 to 20. | 3. We will make a positive difference for our customers, communities and society as a whole..<br><br>We commit at least 1% of pre-tax profits each year to charitable activities <sup>15</sup> . We also aim to drive positive change through leveraging our scale, influence and mutual values.<br><br>Read more on pages 21 to 33. | 4. We aim to build a more sustainable world by supporting progress towards a greener society.<br><br>We are committed to a net-zero future and supporting the UK in achieving its ambition to be net-zero by 2050. We do this by: <ul style="list-style-type: none"> <li>• Working towards our intermediate (by 2030) science-based targets</li> <li>• Delivering against our purpose-led climate change strategy.</li> </ul> Read more on pages 34 to 35. | 5. We will enhance our performance by better reflecting the diversity of our society.<br><br>We are dedicated to building an inclusive modern mutual, that better reflects the diversity of the communities that we serve and represent, and enables our colleagues to thrive and reach their full potential.<br><br>We measure our progress against a broad set of diversity measures.<br><br>Read more on pages 36 to 38. |
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## UN Sustainable Development Goals<sup>16</sup> supported by our mutual good commitments

|                                                                                                                     |                                                                                                                         |                                                                                 |                                                                                                                                                                                              |                                                                                                                          |
|---------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| <b>SDG 1</b> – No poverty<br><b>SDG 8</b> – Decent work and economic growth<br><b>SDG 10</b> – Reduced inequalities | <b>SDG 1</b> – No poverty<br><b>SDG 10</b> – Reduced inequalities<br><b>SDG 11</b> – Sustainable cities and communities | <b>SDG 1</b> – No poverty<br><b>SDG 11</b> – Sustainable cities and communities | <b>SDG 7</b> – Affordable and clean energy<br><b>SDG 11</b> – Sustainable cities and communities<br><b>SDG 12</b> – Responsible consumption and production<br><b>SDG 13</b> – Climate action | <b>SDG 5</b> – Gender equality<br><b>SDG 8</b> – Decent work and economic growth<br><b>SDG 10</b> – Reduced inequalities |
|---------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|

<sup>15</sup>The 1% is calculated based on average pre-tax profits over the previous three years. For 2024/25, this covered the three years ended 4 April 2024 and therefore pre-dated our acquisition of Virgin Money, which completed on 1 October 2024.

<sup>16</sup>For more information, please see the [UN Sustainable Development Goals](#)

# Our approach to identifying sustainability-related risks and opportunities

We continue to advance our understanding of the areas where we can have the most significant, positive impact for our members and customers, communities, and society as a whole.

Our assessment of material ESG topics includes previous engagement with stakeholders as part of our 2024 materiality assessment. This was conducted prior to our acquisition of Virgin Money on 1 October 2024. It also includes our own research and understanding of the landscape in which we operate, and the areas where, as a business, we recognise that we have the scale, capability and expertise to make the biggest difference.

This year, we applied a double materiality lens to our consideration of sustainability-related risks and opportunities, for which we assessed:

- Outbound materiality: the potential risks or impacts that we could pose to wider society, the environment and economy.
- Inbound materiality: the potential financial risks and opportunities for Nationwide.

Our material ESG topics are presented in the table on the next page. Each topic has been mapped to the stakeholder groups for whom it is considered most relevant, and the corresponding Strategy and Risk management sections of this document where it is addressed. More information on our stakeholder groups can be found on page 6 of our Annual Reports and Accounts 2025.

Our Mutual Good Commitments and supporting targets remain broadly reflective of these topics, as well as supporting our own strategic ambitions and broader UK challenges and priorities.

The identification, assessment and management of risks associated with our material ESG topics is inherent within Nationwide sub-group's and Virgin Money's independent, but aligned, Enterprise Risk Management Frameworks (ERMFs) (see page 50). These risks may most notably manifest within certain ERMF risk categories, including business risk, credit risk and operational and conduct risk. More information can be found on page 51.

We will continue to assess the regulatory landscape, including with respect to reporting in alignment with future UK Sustainability Reporting Standards. Our approach to ESG materiality will continue to evolve as regulatory standards develop, as we progress our integration plans following our acquisition of Virgin Money, and as our understanding of sustainability-related impacts, risk and opportunities continues to develop.

We plan to undertake a full materiality assessment for the Group in 2025/26, which will account for our broadened product range, including Virgin Money's business banking services.

| Material topics                                                                                                                                                                                                                                        | Relevance for key stakeholders                                                 | Opportunities – for more information, see Strategy sections below                                                                                                                                                               | Risks – for more information, see Risk management sections below (which can be found in this report, from page 50)                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Financial inclusion and resilience</b><br>We help customers to build long-term financial resilience by offering accessible, inclusive, affordable products designed to support customers at every stage of life.                                    | Customers, communities                                                         | We will offer customers a choice in how they bank with us, and support their financial resilience (pages 10 to 17)                                                                                                              | <ul style="list-style-type: none"> <li>Managing social risks (page 51)</li> <li>Training our colleagues (page 52)</li> <li>Responsible product, services and marketing (page 56)</li> <li>Managing human rights risks (page 57)</li> </ul>                                                                                                                                                                                                                                                         |
| <b>Financial crime and safeguarding information</b><br>We are committed to protecting our customers and the financial system by enforcing robust data protection and economic crime measures.                                                          | Customers, colleagues                                                          | We will offer customers a choice in how they bank with us, and support their financial resilience (pages 10 to 17)                                                                                                              | <ul style="list-style-type: none"> <li>Managing social risks (page 51)</li> <li>Training our colleagues (page 52)</li> <li>Speaking up and whistleblowing (page 53)</li> <li>Economic crime (page 54)</li> <li>Conflicts of interest (page 55)</li> <li>Operational resilience (page 55)</li> <li>Cybersecurity (page 55)</li> <li>Data governance and protection (page 55)</li> <li>Artificial Intelligence (AI) (page 56)</li> </ul>                                                             |
| <b>Ethical business</b><br>We recognise the importance of being trusted by our stakeholders. We remain focused on building a responsible culture, communicating clearly, and engaging regularly as we deliver the benefits of mutuality.               | Customers, communities, regulators and policymakers                            | We will offer customers a choice in how they bank with us, and support their financial resilience (pages 10 to 17)<br>We will make a positive difference for our customers, communities and society as a whole (pages 21 to 33) | <ul style="list-style-type: none"> <li>Responsible business-related risk management (page 51)</li> <li>Managing social risks (page 51)</li> <li>Policies and practices (page 52)</li> <li>Training our colleagues (page 52)</li> <li>Speaking up and whistleblowing (page 53)</li> <li>Data governance and protection (page 55)</li> <li>Responsible product, services and marketing (page 56)</li> <li>Responsible investment (page 57)</li> <li>Managing human rights risks (page 57)</li> </ul> |
| <b>Safe and secure housing</b><br>We help people into safe and secure homes of their own through our products, and use our influence to drive positive change in the housing market.                                                                   | Customers, communities                                                         | We will help more people into safe and secure homes, both our customers who have relationships with us and more broadly (pages 18 to 20)                                                                                        | <ul style="list-style-type: none"> <li>Managing social risks (page 51)</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Decent work and wellbeing</b><br>We are committed to building a high-performing and inclusive culture, through listening to colleagues across our operations, investing in development, and promoting employee wellbeing.                           | Colleagues                                                                     | We will enhance our performance by better reflecting the diversity of our society (pages 36 to 38)<br>Supporting our colleagues (pages 39 to 42)                                                                                | <ul style="list-style-type: none"> <li>Policies and practices (page 52)</li> <li>Training our colleagues (page 52)</li> <li>Health and Safety (page 52)</li> <li>Speaking up and whistleblowing (page 53)</li> <li>Managing human rights risks (page 57)</li> </ul>                                                                                                                                                                                                                                |
| <b>Environmental impact</b><br>We are committed to supporting the UK in achieving its net-zero ambition by 2050. By reducing our own impact and working with our supply chain, customers and the government, we can play our part in driving change.   | Customers, third parties, colleagues, communities, regulators and policymakers | We aim to build a more sustainable world by supporting progress towards a greener society (pages 34 to 35)<br>Engaging our suppliers (pages 43 to 45)                                                                           | <ul style="list-style-type: none"> <li>Managing environmental risks (page 51)</li> <li>Responsible investment (page 57)</li> </ul>                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Diversity, equity and inclusion (DEI)</b><br>Having a diverse range of perspectives, skills and experiences will help us continue to serve our customers in the best way and offer the services and products that are most relevant to their needs. | Colleagues, customers, communities                                             | We will enhance our performance by better reflecting the diversity of our society (pages 36 to 38)                                                                                                                              | <ul style="list-style-type: none"> <li>Policies and practices (page 52)</li> <li>Training our colleagues (page 52)</li> <li>Responsible product, services and marketing (page 56)</li> </ul>                                                                                                                                                                                                                                                                                                       |

# Our mutual good commitments

# 1. We will offer customers a choice in how they bank with us, and support their financial resilience

We recognise the importance of providing customers with choice in how they bank with us, and of supporting and protecting their financial wellbeing. This includes protecting them from economic crime, encouraging good savings habits, making our products and services accessible and inclusive, supporting them with financial education to help them more confidently manage their money, and providing specialist support for customers in vulnerable circumstances.

## Giving our customers choice in how they bank with us

We aim to combine a great digital banking experience with modern branches, where our colleagues can provide personalised and trusted support. Across the Group, we continued to invest in our branches and telephone and mobile banking services.

## Our Branch Promise

We know that branches are important to customers, some of whom rely on our branches or prefer face-to-face assistance. For example, last year, more than 30% of new Nationwide-branded current accounts and over 40% of ISAs were opened in our Nationwide branches.

This is why we are committed to our Branch Promise – to keep every one of our branches open until at least the start of 2028<sup>17</sup>. We have extended our Branch Promise to include Virgin Money branches following our acquisition. Together, we now have almost 700 branches across the UK. We are a part of our communities and enable easy access to cash.

We continue to invest in improving the quality of our branches. Last year we invested around £18 million in upgrading more than 110 of our branches. Nationwide has the UK's largest single-brand branch network, and at the 2025 Moneyfactscompare.co.uk Awards, won the Branch Network of the Year award, for the third year running.

## Making our mobile banking apps better

Our Nationwide and Virgin Money mobile banking apps make it easy, quick and straight forward for customers to manage their money.

We added over 30 new features and improvements across our banking apps. We removed the need to use a card reader (for customers of our Nationwide app) and made our banking app interfaces and experiences more user friendly. We improved fraud prevention features and controls, modernised the way payments are made, and extended support to vulnerable customers. We will continue to innovate and deliver new functionality on our apps that further improves our customers' experience.

## A choice of engagement channels

As well as being able to interact with us through our branches and banking apps, customers can reach us through our telephone channels and 24/7 online chats. We also provide video appointments for customers looking to open accounts with us, providing convenience and flexibility.

Our online Mortgage Manager service made it easy for customers to manage their Nationwide-branded mortgages. And to further improve our service for

customers impacted by fraud, we introduced a dedicated fraud telephony team at Nationwide. We also continued to offer our Scam Checker Service (see page 59).

Following our acquisition of Virgin Money, we increased investment to improve customer experience. We created 370 new jobs dedicated to customer service in Virgin Money contact centres and online chat channels. This has significantly improved its answer rates.

We also created 15 new customer service jobs to support our business banking customers at Virgin Money. In addition, we extended the opening hours of our business banking contact centre and launched a new online chat platform for them.

## Accessible banking for all

As well as giving customers a choice of channel in the way they bank with us, we also seek to make our channels inclusive and accessible for all our customers, including those with access needs.

Around one in five people in the UK are deaf or hard of hearing. For many of them, British Sign Language (BSL) is their primary way of communicating<sup>18</sup>. For customers who use BSL, we offer SignVideo, an online video service that connects users with a qualified BSL interpreter to relay their banking queries to our banking teams. In addition, our Signly service gives access to BSL translation on our Nationwide website. Using Signly, our deaf customers have easier access to essential financial information, enabling them to make better-informed decisions. We also support the Relay UK telephone service, which offers text-to-speech and speech-to-text services.

<sup>17</sup>All our 605 Nationwide branches and 91 Virgin Money branches will remain open until at least 1 January 2028. Opening hours may vary. There may be exceptional circumstances outside of our control that mean we have to close a branch, but we will only do this if we do not have another workable option.

<sup>18</sup>Nationwide launches sign language support | Nationwide

Almost all our branches have power-assisted or automated entrance doors, and level access or wheelchair ramps. All branches have at least one induction loop and we can arrange BSL and interpreters by request<sup>19</sup>.

All newly issued contactless debit cards for adult accounts have notch features, supporting customers who are blind or partially sighted in distinguishing between cards, and in positioning their cards in cash machines and card readers. We can provide letters in braille, audio or large print and most of our ATMs can be used with headphones, providing easy access to cash.

Over the year, we completed the roll out of our Speak Easy communication tool across our Nationwide branches, supporting customers with communication difficulties or who prefer to communicate non-verbally. It consists of visual communication cards designed to help customers navigate key stages of their banking journeys using simple images and icons without speaking. Our Speak Easy tool was recognised as a runner up for Accessible Product of the Year at the 2024 Scope Awards. Speak Easy will be rolled out to Virgin Money branches in the coming year.

We also launched several Easy Read guides<sup>20</sup> on our Nationwide website. These are accessible guides covering common banking topics such as fraud and scams and account opening. The guides use simple language and images, and were developed in partnership with Mencap, a UK charity that supports people with learning disabilities.

At our Virgin Money branches, we have successfully piloted an interpreter service for non-English speaking customers. This service was developed in partnership with the Big Word and enables customers to access

common language interpreters via three-way telephone conversations in branches<sup>21</sup>.

We work with the Digital Accessibility Centre to provide annual reviews of our websites, ensuring they are tested by people with a range of access needs and aiming to meet at least Web Content Accessibility Guidelines (WCAG)<sup>22</sup> 2.2 Level A.

### Supporting vulnerable customers

We are committed to meeting the needs of, and providing good outcomes for, all our customers, including those in vulnerable circumstances.

Our frontline colleagues are trained to recognise indicators of vulnerability and to engage in sensitive, informed conversations with customers. Our product development colleagues are supported by specific vulnerability guidance and training sessions. Where required, our specialist teams provide personalised support to customers, and we signpost customers to trusted organisations including gambling, debt, and mental health charities. In our Colleague Culture Survey<sup>23</sup>, 79% (2024: 76.5%) of colleagues said they felt increasingly equipped to assist vulnerable customers with their different needs.

We are committed to recognising and responding to customer vulnerability in a consistent and respectful manner. To support this, we provide customers with the option to record their support needs and personal circumstances within our systems. This enables us to tailor our services and interactions to better meet their individual needs.

Customers can share their needs with us through all of our mediated channels<sup>24</sup>, and we are rolling out the capability for customers to directly record their support needs through our digital channels. We launched this

feature in our Nationwide app in March 2025.

In addition, our Nationwide sub-group continued to partner with Experian Support Hub, a digital platform that enables customers to share and manage their support needs across multiple participating organisations through a single, free digital interaction, reducing the need for repeat conversations across organisations.

We use a range of insights and research initiatives, and work with external parties, to better understand vulnerability across our customer base, identify opportunities for improvements, inform strategy and proposition development and help us monitor the outcomes vulnerable customers are experiencing compared to other customers. Enhancements in our datasets have enabled improved monitoring of customer outcomes.

### Consumer Duty

We are committed to achieving good outcomes for our customers. We have implemented the requirements of the FCA's Consumer Duty for products and services that are open for sale or renewal, which came into effect on 31 July 2023, and for closed products and services, which came into effect on 31 July 2024.

A range of activity was undertaken across the Group in 2024/25 to support good customer outcomes, including improving our approach to designing and reviewing customer communications, product governance and the value offered by our products and services. In addition, we uplifted mandatory training for all colleagues on how to identify and support vulnerable customers, and enhanced our insights to better understand vulnerability in our customer base, and to improve reporting on customer outcomes and product and service design.

<sup>19</sup>The branch finder on our Nationwide and Virgin Money websites confirms facilities at each of our branches.

<sup>20</sup>Easy Read | Nationwide

<sup>21</sup>There are 62 common languages available on demand, and an appointment can be offered for less common languages and British Sign Languages. This service will be rolled out to all Virgin Money branches and contact centres over the coming year.

<sup>22</sup>Understanding WCAG 2.2 - Service Manual - GOV.UK

<sup>23</sup>Results reflect Group Colleague Customer Survey from March 2025. Comparator reflects results from Nationwide sub-group's Colleague Culture Survey in October 2024.

<sup>24</sup>Any channel where there is a human contact point, for example telephone, chat, branch, specialist team.

The Board Risk Committee continued to oversee the embedding of the FCA's Consumer Duty across the Group and regularly monitors customer outcomes.

### Supporting customers experiencing financial pressures

Our product and lending criteria are designed to meet customer needs and to avoid detrimental impacts to our customers. We use credit assessments to ensure we lend responsibly, and we also assess, through product and service design, how customers with vulnerability characteristics might be impacted by a product or service and consider how to best mitigate the risks. More information can be found on page 51.

We support customers who may anticipate or find themselves experiencing a period of financial difficulty. We have defined overarching requirements in place to govern our approach to dealing fairly with customers in financial difficulty, payment shortfall, arrears, and debt recovery, as well as offering forbearance options for customers.

We encourage customers to come to us if they have any concerns about their current or future financial position. Our websites provide options and guidance to support customers with managing their money<sup>25</sup>. This includes guidance on budgeting, help with essential costs and ways to save. It also includes information on mortgage support, managing borrowed money effectively, and understanding the process around, and getting out of, persistent debt. Our Nationwide branches offer free financial health checks, and we continue to provide our dedicated cost of living helpline. Our online Mortgage Manager service makes it easier for customers with Nationwide-branded mortgages to stay on top of their mortgage payments, where they can switch product or extend their mortgage term to reduce their borrowing costs.

Where appropriate, our specialist support teams provide personalised support to those experiencing financial difficulties. We signpost charities to help further in situations where customers have debts across multiple lenders. Across our Nationwide and Virgin Money sub-groups, we partner with IncomeMax and Turn2us respectively, who can help people identify and claim the benefits or grants they may be entitled to. Customers at Virgin Money can also assess their eligibility for financial support grants through our new tool – Turn2us Grants.

In instances where customers might fall into persistent debt on their credit card, or into repeat overdraft usage on their current account, we reach out to support them with steps they can take to resolve the debt. If a customer is still in persistent debt on their credit card, and we have been unable to reach an agreed repayment plan, in line with regulatory requirements, we suspend their card to prevent them adding further to their debt.

### Supporting customers through life events

We want to provide the best support for customers experiencing challenging life events, such as illness, bereavement, and job loss, to help them stay on top of their money when life is tough. Where appropriate, our specialist support teams provide tailored support, including helping customers to assess and manage their finances, and understand the choices available to them.

We can also signpost or refer customers to organisations that can provide additional support and guidance. In 2024/25, this included Money Wellness Group for money advice, IncomeMax and Turn2us for benefits support, and Mental Health UK, Mind and SAMH (Scottish Action for Mental Health) for mental health support. We have a range of ways to enable our customers to get help from a third party they trust, including temporary help with simple, everyday banking, to long-term support with their finances.

This year, Virgin Money rolled out a customer support portal to provide additional guidance for our frontline colleagues. It contains all internal support procedures, specialist support team contacts and information on charities that we signpost customers to for expert help. All customer-facing colleagues were offered training on how to use the portal, and the tools within it.

Our Nationwide sub-group delivered new bereavement and power of attorney processes to improve customer experience, and we provided customers with the option to register a bereavement on our website.

### Supporting customers experiencing mental health challenges

We aim to support customers who may be experiencing money and mental health challenges, as the two are often interlinked. We have taken steps to make our services and products more accessible for customers, including providing support on our website and letting customers know what we can do to help.

Our specialist support teams can signpost customers to Mental Health UK, Mind and SAMH for one-to-one mental health support. This year, Virgin Money launched a bespoke training programme to equip frontline colleagues with the skills required to speak to customers about their money worries and mental health, and introduced guides for signposting customers to relevant mental health support across the UK. More information on our partnership with Mind and SAMH can be found on page 28.

In March 2025, Nationwide received the 'Advanced' accreditation from the Money and Mental Health Policy Institute (MMHPI) through their Mental Health Accessible Programme.

<sup>25</sup>Webpages include: [Help with money worries](#) | [Nationwide, Managing your money](#) | [Nationwide, Virgin Money Credit Cards](#) | [Money worries](#) | [Virgin Money UK, Tips to manage your money](#) | [Cost of living](#) | [Help & Support](#) | [Virgin Money UK](#)

## Supporting customers experiencing financial and economic abuse

We are committed to supporting our customers affected by financial and economic abuse and helping them take back control of their money. All our frontline colleagues are trained to identify and support the needs of customers impacted by financial and economic abuse. We are signatories of the UK Finance Financial Abuse Code of Practice, which first launched in 2018 and is designed to raise awareness among colleagues and provide best practice in supporting those needing to regain control of their finances. The Code was refreshed over the last year.

We offer safe spaces in over 430 of our Nationwide branches. These are private rooms where anyone experiencing domestic abuse or exploitation can access supporting information or discreetly contact friends, family, specialist organisations, such as Hestia, or the police. To build on our launch of physical safe spaces, through our Nationwide sub-group, last year we introduced:

- a dedicated contact form<sup>26</sup> that enables customers experiencing domestic or financial abuse to request a call back from our specialist support team at a time that is safe for them
- a domestic abuse referral process that enables our specialist support teams to respond in real time to urgent cases
- acceptance of Economic Abuse Evidence Forms from other debt organisations, to prevent victim-survivors from having to re-tell their story to multiple firms.

We are participants of the UK Finance Abusive Payments Working Group, created to find a collective solution across industry to stop incidences of abusive messages being sent via a faster payment reference. In addition, our Nationwide sub-group is participating in lived-experience research with the University of Northumbria and Surviving Economic Abuse to support this work.

## Supporting customers impacted by the harms of gambling

Research highlights a large gap between the number of people who require support of gambling harms and the number of people accessing gambling support services<sup>27</sup>. In addition, financial service providers have valuable insights into consumer gambling habits, allowing a unique chance to assist those affected by gambling-related harms. This is why, at Nationwide, we are partnered with GamCare, the UK's leading support provider for anyone impacted by the harms of gambling. GamCare offers tailored support, including access to GamBan and GamStop, services that enable customers to block their spending and self-exclude themselves from gambling websites and apps.

Gambling blocks are available to customers of our Nationwide sub-group through our banking app, branches and telephone lines. In April 2024, we made these blocks available on the internet bank. Once a block is activated by the customer, should they wish to remove it, there is a 72-hour cooling off period before the card can be used again for gambling.

We also signpost or refer customers to organisations that can provide additional support and guidance. Last year, this included the National Gambling Helpline, Citizens Advice, and Money worries.

We are members of the Money and Mental Health Policy Institute's Gambling Harms Action Lab – a three-year programme bringing together eight current account providers, including Nationwide and Virgin Money sub-groups, to develop and implement new tools to proactively address gambling-related harm. We are focused on developing intervention measures using available transactional data to build upon our current responsive controls.

## Protecting our customers from fraud and scams

We work hard to protect our customers from fraud. This year, we introduced a dedicated fraud telephony team at Nationwide, and new fraud prevention measures across our Nationwide and Virgin Money banking apps. We continued to offer our Scam Checker Service (see page 59) and build awareness around scams via scam warnings in our apps. Since its launch in 2021, our Scam Checker Service has helped prevent around £16 million in potential scams.

We held educational events and provided online material on recognising and preventing fraud and scams. We also engaged in wider campaigns to raise awareness, for example supporting the industry fraud awareness campaign, Take Five, and with media campaigns on keeping safe from scams. We are participants of Stop Scams UK, a cross-industry group collectively working to prevent scams and protect our customers.

In addition, last year across the Group, our fraud defence systems and specialist fraud team helped prevent around £200 million of attempted fraud on card and online transactions.

For customers who are impacted by fraud or scams, we deal with each case sensitively, and on an individual basis. We provide tailored aftercare support to impacted customers, including through our partnership with Victim Support.

<sup>26</sup>Domestic and financial abuse contact form | Nationwide

<sup>27</sup>Shining a light - Money and Mental Health Policy Institute

## Building financial resilience through financial education

Approximately one in four adults in the UK have low financial resilience. Research demonstrates that there is a critical link between financial resilience and financial education – those with low financial capability are three and a half times more likely to be in financial difficulty because they have missed paying domestic bills and/or credit card commitments<sup>28</sup>.

We are a member of UK Finance's Education Committee, collectively seeking to address the financial education gap. We provide Money Lessons through our Nationwide sub-group, and a Make £5 Grow programme through Virgin Money, as described below.

### Providing Money Lessons for children

Our research<sup>29</sup> shows that 59% of parents rank personal finance skills above maths and digital skills – second only to literacy. Almost nine in ten (89%) parents of 8-13 year-olds say that more personal finance education would help their children better understand the value of money, highlighting the value placed on practical skills in addition to traditional subjects. Despite this, 84% of parents surveyed said their child had not received financial education at school.

It is important that children are offered essential digital skills and financial education to help them understand the value of money, budgeting, and staying safe while using digital channels.

Through Money Lessons, we provide financial education to school children aged 7-14 (equivalent to English school years 3-9). The content covers money-related topics, including banking, savings, borrowing, debt and financial safety. It has been created by Nationwide colleagues, and aligns with the Financial Education Framework, and supports personal, social, health and economic (PSHE) and Citizenship elements of the Department for Education (DfE) National Curriculum. Our Money Lessons also support the Money and Pensions Service (MaPS) goal to see two million more children and young people across the UK receiving a more meaningful financial education by 2030 (against a baseline of 2020).

Money Lessons can be delivered through colleague-led sessions at local schools or in other settings, such as sports clubs, youth clubs, Brownies, Girlguiding, Cubs, and Scouts. Between January 2025, when we relaunched our Money Lessons programme, and June 2025, our colleagues delivered Money Lessons to over 6,000 pupils.

Money Lessons can also be delivered through teacher-led sessions, with educators now able to access Money Lessons modules via our website. This approach has expanded our reach of Money Lessons to all parts of the UK, beyond where we have a Nationwide presence. Between January 2025 and June 2025, more than 2,500 lessons had been downloaded, reaching an estimated 80,000 pupils<sup>30</sup>.

To extend our reach to help more children, we have collaborated with Widgit to ensure our content is special education needs (SEN) friendly.

We have received positive feedback from teachers around the quality and impact of Money Lessons with one teacher saying:

*“Bravo Nationwide! We have been looking to facilitate financial literacy in our school for a while, and this came about just at the right time. The content was excellent. Usually, a lesson plan will give ideas and suggestions on how to reach your outcomes, but this was ready to go – I didn't need to do any additional research (which saved me time) – everything I needed was already there. The class enjoyed the content and resulted in lots of good questions and curiosity.”*

### Make £5 Grow with Virgin Money

A research study revealed that over 80% of children aged 9-11 aspire to start their own business one day and 71% want to learn the skills to do so at school<sup>31</sup>. Virgin Money's Make £5 Grow programme<sup>32</sup> encourages primary school children to develop financial literacy and build their entrepreneurship skills.

Schools are loaned £5 per pupil taking part in the programme. Each pupil is encouraged to use the £5 to develop innovative business ideas and turn it into profit for their school. It gives them insight into how business works and helps them build money management skills for the future. In addition, children have access to a Make £5 Grow Ambassador and online resources to support them. The schools keep any profit made after repaying the initial £5 loan.

Since its launch in 2016, Make £5 Grow has reached around 250,000 pupils from over 3,000 schools. It has been awarded the Financial Education Quality Mark by Young Enterprise.

<sup>28</sup>Financial Lives 2024: Key findings from the FCA's Financial Lives May 2024 survey

<sup>29</sup>Parents say personal finance is a more important life skill than maths for schoolchildren (nationwidemediacentre.co.uk); May 2024

<sup>30</sup>Through the teacher-led sessions, reach figures are estimated using an assumption that each download represents 30 students engaging with a lesson. For the colleague-led sessions, reach figures are estimated based on confirmed class sizes when the session is delivered.

<sup>31</sup>UK kids dream big as majority aspire to start their own business | Virgin Money PLC, Research carried out with 1,000 UK children aged 9-11 (via their parents) by One Poll in March 2025.

<sup>32</sup>Make £5 Grow | Virgin Money UK

We have received positive feedback from teachers around the quality and impact of Make £5 Grow with one teacher saying:

“The children count down the days until we start the Make £5 Grow project. They gain invaluable entrepreneurial skills, and the joy it brings is incredible. I always recommend it to other schools.”

## Financial inclusion

In support of the work of the Government's Financial Inclusion Committee<sup>33</sup>, we believe everyone deserves access to banking services to support their financial independence. In 2024, there were 900,000 unbanked adults in the UK<sup>34</sup>. Access to a bank account is essential for financial inclusion, enabling individuals to participate in the financial system and manage their money effectively.

We recognise that, due to circumstances or perhaps past experience of financial difficulties, not everyone will qualify for all of our current accounts. Our Nationwide FlexBasic account and Virgin Money M account provide fee-free banking solutions for individuals who may not qualify for standard current accounts. We are the second largest provider of such accounts in the UK.

We also make it easier for other, more vulnerable groups to access financial services, where opening a bank account may be more challenging. For example, through our prisoner banking programme at the Nationwide sub-group, we assist prisoners in opening accounts ready for their release, supporting them in reintegrating into society. We currently partner with seven prisons and have opened around 3,000 bank accounts since the programme began in 2017.

We work with third-party organisations to develop our offerings for promoting financial inclusion. Our Branch Promise (page 10) also supports our vulnerable customers who rely on our branches for their banking needs.

This year, we partnered with Project Nemo<sup>35</sup> to help tackle the financial exclusion of people with a learning disability. Through our Nationwide sub-group, we have commissioned new primary research to better understand the needs and experiences of these users, which will be published in the coming months as a call to action across financial services.

## Encouraging good savings habits

Research from the FCA found that one in ten people in the UK have no cash savings at all, and another 21% have less than £1,000 to draw on in an emergency<sup>36</sup>.

In line with the Money and Pensions Service's (MaPS) 'Nation of Savers' national goal to encourage two million more people to save regularly by 2030<sup>37</sup>, we aim to encourage good savings habits, as this can help customers build financial resilience and contribute to long-term financial security.

Our mutual model is intrinsically more rewarding than our banking peers, as we deliver value to our customers and members rather than paying dividends to shareholders. We do not offer 'brand new customer only' savings accounts. More details on our broader retail deposit performance, and the value we delivered, can be found on page 13 of our Annual Report and Accounts 2025.

Our range of savings products supports different savings needs, and we seek to make it easier to save. Through our Nationwide and Virgin Money banking apps, customers can set financial goals to support savings behaviours.

We also have a range of money management features in place to help customers towards their savings goals, such as round up and balance sweep features, and a savings calculator. Over the year, around 235,000 savings goals were set up by customers.

We recognise that putting away even a small amount every month promotes an individual's financial wellbeing, by helping form a positive savings habit and relationship with money in general<sup>38</sup>. Our Nationwide Flex Regular Saver is designed to help people start a regular monthly savings habit, and offered an interest rate of 6.5%.

Our webpages provide guides to helping customers find a savings account that is right for them. Our webpages also support customers in creating a budget plan, reviewing essential costs and understanding entitlement to benefits or grants, and guidance on prioritising bills and debts, and managing borrowing. In addition, we offer customers a free savings review in our Nationwide branches, to support them in their savings journey and help them get the most from their savings. Customers registered with our SavingsWatch service are informed of our latest, and best, savings rates and products.

To support young savers in building early savings habits that will benefit them in the long term, we offer our fee-free FlexOne and M Power child current accounts at our Nationwide and Virgin Money sub-groups respectively. Both current accounts are supported by linked savings accounts, and last year, we also launched a Children's Future Saver account within our Nationwide sub-group, designed to help parents or guardians save on behalf of a child.

<sup>33</sup>Financial Inclusion Committee - GOV.UK

<sup>34</sup>Financial Lives 2024: Key findings from the FCA's Financial Lives May 2024 survey

<sup>35</sup>Project Nemo – Accelerating disability inclusion in FinTech

<sup>36</sup>Financial Lives 2024 survey | FCA

<sup>37</sup>Nation of Savers: a report from the UK Adult Financial Wellbeing Survey | Money and Pensions Service

<sup>38</sup>Adult Financial Wellbeing Survey 2021

## Our FlexStudent account

Our Nationwide FlexStudent account supports students aged 18 or over in managing their money while on a full-time UCAS registered course of two years or more. Last year, we attracted a record 46,000 (2023/24: 17,900) students, achieving a 27% share of new student current accounts opened across the market<sup>39</sup>. Qualifying students received £100 cash vouchers and access to £120 Just Eat vouchers upon opening their account<sup>40</sup>. Our FlexStudent account was listed in the MoneySavingExpert's Best student accounts 2024/25.

## Listening to customer feedback

As a mutual, we are here for our customers. This includes our members as owners and a broader set of customers who hold retail banking products with us. It also includes our buy to let customers, and business banking customers. We value their feedback as it helps us improve our propositions and services further.

Our customers can have their say and input through a range of channels. Members can hear from, and engage with, Board directors through our Annual General Meeting (AGM). We also engage with retail banking customers through our business operating channels, online research communities and customer experience surveys, where they can rate their satisfaction and ease of interacting with us, and leave feedback.

We engaged with landlords and buy to let intermediaries through our mortgage and intermediary relationship teams respectively, as well as through our research providers and our internal research team at The Mortgage Works. We engaged with our business banking customers through our business relationship managers and customer experience surveys.

The Board continued to review customer service and satisfaction data regularly through the year. Within our Nationwide sub-group, our customer experience score is one of our key performance indicators, and is based on the feedback customers provide when they complete our survey, as described on page 17 of our Annual Report and Accounts 2025. In March 2025, our customer experience score of 83.8%<sup>41</sup> was above our target of 83.6%. Customers were satisfied with the service across our channels, particularly from colleagues in branches. Our new Nationwide banking app, and enhancements made through the year, also contributed positively to our score.

We also compare our performance against peers. In 2025, our Nationwide brand remained first for customer satisfaction among our peer group for the 13th year running<sup>42</sup>. In an independent survey conducted by Ipsos, on behalf of the Competition and Markets Authority (CMA), which asked personal current account customers how likely they would be to recommend their provider's branches, our Nationwide brand came first in both Great Britain and Northern Ireland, with Virgin Money ranking

tenth in Great Britain<sup>43</sup>. Virgin Money branches are now covered by our Branch Promise, and we will invest to improve customer service through them.

More information on how we have engaged with, and responded to feedback from, each of our key stakeholder groups during the past year, can be found on pages 19 to 22 of our Annual Report and Accounts 2025.

## Addressing complaints

Whilst we strive to deliver good outcomes for all our customers, we know that things can sometimes go wrong. We welcome feedback from customers so that we can put things right and provide a better experience for the future.

We aim to investigate all complaints quickly and in a fair way, and undertake root cause analysis to identify the source, learn from our mistakes and provide a remedy. In doing so, we are committed to reducing the number of complaints we receive. Our customer-facing colleagues are given training in identifying and recording complaints, helping us to effectively manage the experience customers have with us when they approach us.

<sup>39</sup>Based on Curinos eBenchmarkers comparison of financial services providers and Nationwide analysis, April 2024 to February 2025.

<sup>40</sup>In order to qualify for the £100 bonus and food vouchers, students needed to open a FlexStudent account between 16 July and 31 October 2024, and deposit £500 into their account by 13 December 2024. The £100 bonus was paid into their account within 14 days of the £500 deposit. £10 Just Eat Vouchers were made available each month via an online portal that students were given access to following their deposit.

<sup>41</sup>Our customer experience score measure is based on the 12 months ended 31 March 2025, and is calculated by weighting the aggregated scores across Nationwide channels to reflect the way customers interact with us. Digital channels include our Nationwide mobile banking app, internet bank and webchat.

<sup>42</sup>Nationwide brand lead as at March 2025: 7.5%pts, March 2024: 5.5%pts. © Ipsos 2025, Financial Research Survey (FRS), for the 12 months ended 31 March 2013 to 12 months ended 31 March 2025. Results based on a sample of around 47,000 adults (aged 16+). The survey contacts around 50,000 adults (aged 16+) a year in total across Great Britain. Interviews were face to face, over the phone and online, taking into account (and weighted to) the overall profile of the adult population. The results reflect the percentage of extremely satisfied and very satisfied customers minus the percentage of customers who were extremely or very or fairly dissatisfied across those customers with a main current account, mortgage or savings. Those in our peer group are Barclays, Halifax, HSBC, Lloyds Bank, NatWest, Santander and TSB. Prior to April 2017, those in our peer group were Barclays, Halifax, HSBC, Lloyds Bank (Lloyds TSB prior to April 2015), NatWest and Santander.

<sup>43</sup>According to an independent phone survey of 17,234 customers (aged 16+) of the 17 largest current account providers in Great Britain, and 5,612 customers (aged 16+) of the 11 largest current account providers in Northern Ireland, between January 2024 and December 2024, run by Ipsos. Learn more at [Ipsos.uk/personal-banking-service-quality](https://www.ipsos.uk/personal-banking-service-quality).

Based on available data from the FCA<sup>44</sup>, over H2 2024, our Nationwide sub-group was a top performer in continuing to receive fewer complaints relative to its size compared to its peers for home finance, and ranking third for banking-related complaints. Virgin Money improved its position over the year, receiving fewer complaints for banking, credit card and home finance performance, following increased investment to improve customer experience across the organisation.

Furthermore, of the complaints that were escalated to the Financial Ombudsman Service (FOS) across the industry<sup>45</sup>, our Nationwide sub-group had the lowest proportion of complaints upheld by the FOS, compared to our peer group, and Virgin Money complaints that were upheld by FOS were lower than the industry average.

Complaints identified as being from vulnerable customers are prioritised through our urgent complaints process. Where appropriate, support is provided by our specialist support and customer vulnerability teams. We will continue to strive for leading levels of service, and invest in customer experience.

More information can be found at [Complaints data | Nationwide](#) and [Complaints data | Virgin Money UK](#)

<sup>44</sup>[Complaints data | FCA](#). Our peer group consists of Barclays, Bank of Scotland, The Co-operative Bank, HSBC, Lloyds Bank, NatWest, Royal Bank of Scotland, Santander, and TSB. The FCA define H2 2024 for the Nationwide sub-group as data between 5 April 2024 and 10 October 2024, and for Virgin Money as 1 April 2024 to 30 September 2024. The FCA define H1 2024 for the Nationwide sub-group as 5 October 2023 to 4 April 2024, and for Virgin Money as 1 October 2023 to 31 March 2024.

<sup>45</sup>[Half-yearly complaints data: H2 2024 – Financial Ombudsman service](#), H2 2024 (July to December 2024) and H1 2024 (January to June 2024).

## 2. We will help more people into safe and secure homes, both our customers who have relationships with us and more broadly

We were founded to help people into homes of their own, and this remains important to us today. While we serve all our mortgage customers, we provide targeted support to help first time buyers into homes and support the quality of homes for those who rent, as well as lending to the social housing sector. More details on our broader lending performance can be found in our Annual Report and Accounts 2025.

### Helping first time buyers into homes of their own

We believe everyone should have a place fit to call home, and we aim to increase the accessibility of home ownership for first time buyers.

Home ownership comes with many benefits, including cultural, social, security, and financial benefits. At a broader level, it also enables economic mobility, financial inclusion, and strengthens social cohesion in communities.

However, a recent survey from the Building Societies Association (BSA)<sup>46</sup> revealed a decline in consumer confidence in the housing market. Increasingly fewer people believe now is a good time to buy a home, because of the longstanding affordability challenges that face the housing market.

For those wanting to buy a home, and especially for first time buyers, affordability of monthly mortgage repayments, raising an upfront deposit, and gaining access to a large enough mortgage are consistently cited as the top three barriers to home ownership<sup>47</sup>. In addition to these factors, around one in three people now also highlight the increased stamp duty tax<sup>48</sup> as a barrier to home ownership.

As the landscape becomes increasingly challenging, we remain committed to helping first time buyers onto the property ladder. Over the year, Nationwide helped more first time buyers than any other bank or building society in the UK<sup>49</sup>. Across the Group, we helped 120,000 (2024: 64,000) first time buyers into a home of their own<sup>50</sup>, including through our Helping Hand mortgage.

### Helping Hand mortgage

Our Helping Hand mortgage directly supports our commitment to helping first time buyers into homes, by reducing the pressure of saving for a large deposit.

Over the year, to further address affordability challenges, we extended our Helping Hand mortgage to enable first time buyers to borrow up to six times their income (previously 5.5 times) when taking out a five- or ten-year fixed rate mortgage, up to 95% loan to value<sup>51</sup>.

Nationwide was the first major high street lender to lend up to six times income, which is up to 33% more than the maximum borrowing available on our other standard mortgage products<sup>52</sup>. We continued to offer £500 cashback alongside this mortgage to further support first time buyers.

Last year, our Helping Hand mortgage was chosen by 27% (2024: 15%) of all first time buyers that took a Nationwide-branded mortgage, and represented 33% (2024: 21%) of the total value of all Nationwide-branded first time buyer mortgages.

Of the first time buyers taking out a Helping Hand mortgage, 70% (2024: 66%) were sole (rather than joint) applicants, compared to 45% (2024: 46%) of applicants using other Nationwide-branded mortgage products. This reflects that sole applicants are more likely to be challenged by loan-to-income requirements and therefore benefit more from our Helping Hand offering. Since 2021 when we launched the proposition, we have lent around £11 billion through Helping Hand mortgages – equating to around 40,000 first time buyer completions.

<sup>46</sup>Consumer confidence in the housing market declines

<sup>47</sup>Property Tracker Survey, Building Societies Association

<sup>48</sup>From 31 March 2025, the threshold at which stamp duty is applied to first time buyer increased in England and Northern Ireland; first time buyers are now required to pay stamp duty on properties worth over £300,000 (previously £425,000). In addition, the threshold purchase price for which first time buyers are offered relief from has reduced to £500,000 (previously £625,000). More information on the current taxes can be found here: [Stamp Duty Land Tax: Overview - GOV.UK](#)

<sup>49</sup>Based on the number of residential first time buyer mortgage completions in the UK by Banking Brand, between April 2024 to March 2025. Provided by CACI Ltd Mortgage Market database.

<sup>50</sup>Our definition of a first time buyer is set out in the Glossary for the Annual Report and Accounts 2025, available at [nationwide.co.uk](#)

<sup>51</sup>All Helping Hand applications will continue to be subject to robust underwriting checks, including full assessment of credit score and additional credit commitments, to ensure Nationwide lends responsibly.

<sup>52</sup>Nationwide offers big boost to first-time buyers

UK mortgage regulations had limited the amount of high loan-to-income<sup>53</sup> (LTI) lending that banks and building societies could do (see page 20). As a result of the extended borrowing of Helping Hand mortgages, Nationwide has had to regularly adjust its minimum income requirement to ensure its lending complies with this regulation, whilst helping as many first time buyers as possible.

While many of our peers concentrate their high LTI lending on higher earners, we prioritise supporting first time buyers. Around 90% of high LTI lending through our Nationwide sub-group has been directed towards first time buyers, including through our Helping Hand mortgages. Following successful Nationwide engagement with government and regulators, the Bank of England announced the ability for mortgage lenders to secure an exemption from the rules that will enable them to lend more than 15% of their mortgages at high LTIs. The Bank of England also launched a consultation paper on making this change permanent, which we will respond to. We believe that the ability to increase our high LTI lending will enable us to lend to 10,000 more first time buyers per year.

To help first time buyers navigate towards home ownership, we provide online guides to getting their finances mortgage ready and buying a first home. Our Nationwide sub-group also participates in the Government's First Homes affordable housing scheme.

### **Supporting landlords and helping them to provide quality homes for their tenants**

We support landlords and those who rely on the private rented sector for their long-term housing needs through our buy to let business, The Mortgage Works, and

through Virgin Money. We are the UK's largest buy to let lender, with a 19.8% (2024: 14.3%) share of total buy to let balances following our acquisition of Virgin Money. The Mortgage Works won Best Buy-to-Let Mortgage Lender in the Your Mortgage Awards 2024/25.

In 2023, 3.8 million households failed to meet the Decent Homes Standard<sup>54</sup> and, as in previous years, the private rented sector had the highest proportion (21%) of non-decent homes<sup>55</sup>. We are working to improve the quality of private rented homes and supported the introduction into law of both the Decent Homes Standard and Awaab's Law<sup>56</sup>. More information on how we seek to influence for better outcomes for both landlords and tenants can be found on page 20.

We ensure the buy to let homes on which we lend on through The Mortgage Works are fit to be let and meet our minimum standards, that are informed by, and exceed, the Decent Homes Standard recommendations. Properties that do not meet these conditions must complete remediation works prior to us lending on the property. Further checks are also completed within our assessment, such as ensuring there are no environmental concerns linked to the property and that there is a valid Energy Performance Certificate (EPC) in line with legislation. At Virgin Money, most of our buy to let homes are inspected by surveyors, who complete checks such as ensuring there is a valid EPC<sup>57</sup>.

To further support quality homes for tenants, we provide education and help through The Mortgage Works website, to aid landlords' understanding of their responsibilities and provide insight into the latest legislation changes and housing market news. We engage with landlords on specific issues through our dedicated research team, to understand what they find challenging

and how we can better help them. We have also published in-depth reports<sup>58</sup> that explore key challenges within the private rented sector.

### **Lending to the social housing sector**

Social housing plays an important role in supporting the most vulnerable sections of society – it helps prevent homelessness, helps people get ahead in life, and improves health and education outcomes and employment potential<sup>59</sup>.

However, there are an estimated 1.3 million households on social housing waiting lists, the highest level since 2014<sup>60</sup>. As a result, the private rented sector is housing many vulnerable people who would be better suited to living in social housing, where they would have a more stable long-term home. We aim to increase the provision of social housing and remove the reliance on the private rented sector for the most vulnerable in society.

We are one of the key lenders to social housing providers across the UK. Last year, we delivered £825 million (2024: £1,323 million) of lending to the sector. This included new lending and the refinancing of existing facilities.

We continued to offer Sustainability Linked Loans (SLLs) to registered social landlords, providing them with a rate reduction if they achieve pre-agreed sustainability-related key performance indicators (KPIs). For example, these could be KPIs related to improvements in the overall EPC composition of their books, or reductions in their carbon emissions. We continue to incorporate an SLL option into new loan documentation, for customers who would like to exercise this option at a later date. Last year, over £500 million of loans were converted into SLL facilities.

<sup>53</sup>High loan to income lending is defined as lending that is more than 4.5 times income of borrower.

<sup>54</sup>A Decent Homes Standard in the private rented sector: consultation - GOV.UK

<sup>55</sup>Chapter 1: Housing quality - GOV.UK

<sup>56</sup>Awaab's Law to force landlords to fix dangerous homes - GOV.UK

<sup>57</sup>At Virgin Money, around 80% of buy to let homes are physically visited by surveyors, and around 20% of valuations are conducted virtually by professional surveyors or via Automated Valuation Models (AVMs).

<sup>58</sup>Private Rental Sector reports | The Mortgage Works

<sup>59</sup>The value of social housing - Shelter England

<sup>60</sup>Social housing lettings in England, tenants: April 2023 to March 2024 - GOV.UK

### **Influencing for positive change in UK housing**

We continue to use our capability, scale and influence to drive positive change across the UK housing market.

Our support for first time buyers remained a key focus area for us. We successfully engaged with government, regulators and the Bank of England to call for an increase in the Financial Policy Committee's LTI cap, and changes put in place will allow individual lenders to exceed the limit of no more than 15% of total qualifying loans being lent at or above 4.5 times income. We believe that increasing the cap will support the Government's economic growth goals and help more people to access the long-term benefits of home ownership.

We also collaborated with peers to call for a change to mortgage payment rules, to enable part-repayment part-interest-only payments for first time buyers, that help reduce their monthly costs and improve the affordability challenges associated with home ownership. In addition, we supported government reforms of the planning system to enable more housing development on grey belt land, which we believe will increase housing supply and improve housing affordability in the long term.

Beyond our work to support first time buyers, we continue to engage with government to help good landlords to deliver high-quality private rented homes. We remain supportive of the bulk of measures in the Renters' Rights Bill, subject to their effective implementation, including enabling disputes between tenants and landlords to be resolved before they escalate to court. We have engaged with the Government and MPs to share our views on the Bill as it passes through Parliament before coming into force later this year.

Nationwide also raised concerns around the timing of changes in relation to EPC reform<sup>61</sup> in the private rented sector, as the lack of access to skilled tradespeople, and the proposed cost caps, may cause landlords to exit the market. We believe a longer implementation period before the EPC reform takes place would help keep landlords in the sector while supporting the greening of homes.

To encourage the transition to green homes, we continued to engage with the Government to shape their Warm Homes Plan and provide financial support for green homes lending. Specifically, we called on the Government to launch a single green homes portal to deliver the guidance to customers that they need to green their homes.

<sup>61</sup>The Government has set out proposals to require properties to have a minimum EPC rating of C before they can be let. These requirements are scheduled to come into place in 2028 for new tenancies and 2030 for existing tenancies.

## 3. We will make a positive difference for our customers, communities and society as a whole

### Committing 1% of our profits to charitable activities

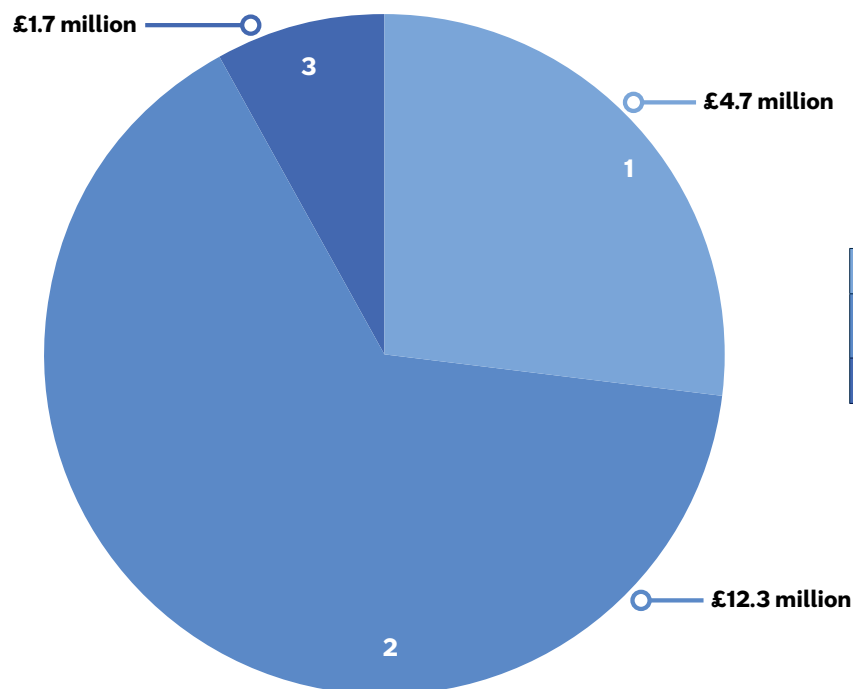
As a mutual, we are guided by a social purpose and aim to have a positive and meaningful impact in our communities.

Over 2024/25, we committed more than £20 million to charitable activities. This included £18.7 million<sup>62</sup> (2024: £15.5 million) as part of our long-standing commitment to direct at least 1% of our pre-tax profits each year to charitable activities. It also included £1.8 million in donations awarded by Virgin Money.

Our £18.7 million commitment was primarily put towards Nationwide Fairer Futures – our new social impact strategy (see page 22). It also included our commitment to the Nationwide Foundation (see page 31), and the internal costs of managing our social impact activity. The distribution of our 1% commitment is illustrated opposite.

Of the £1.8 million donated by Virgin Money, £1.1 million was awarded to the Virgin Money Foundation (see page 33).

### Allocation of 1% spend in 2024/25



|   |                                               |
|---|-----------------------------------------------|
| 1 | The Nationwide Foundation                     |
| 2 | Social impact strategy – charitable donations |
| 3 | Social impact strategy – operational costs    |

<sup>62</sup>Our charitable commitment of 1% of pre-tax profits is based on average profits over the previous three years. For 2024/25, this preceded the acquisition of Virgin Money on 1 October 2024. Our commitment of £18.7 million included £17.0 million of charitable donations and £1.7 million relating to supporting activity and staff costs. From 2025/26, our 1% commitment will be used to fund the activities of Nationwide's social impact strategy and associated operational costs, the Nationwide Foundation, and the Virgin Money Foundation.

# Nationwide Fairer Futures – our new social impact strategy

In June 2024, we launched Nationwide Fairer Futures, created to support those who have been dealt an unfair hand. It was designed to maximise the impact we can have on society by focusing on key social issues (youth homelessness, families living in poverty and people living with dementia) that impact across generations – young people, families, and older people.

We have partnered with three charities: **Centrepoint**, **Action for Children**, and **Dementia UK** to help us make a meaningful difference.

In April 2025, we added a fourth partnership with **The Royal Marsden Cancer Charity**, to additionally focus on better outcomes and fairer futures for those affected by cancer.

## About our Nationwide Fairer Futures partnerships and ambitions



### Helping to end youth homelessness, in partnership with Centrepoint

We have partnered with Centrepoint because, every four minutes, a young person faces homelessness<sup>63</sup>. This is not acceptable and we need to take urgent action to ensure every young person has a safe place to call home.

Centrepoint provides holistic support and a voice for young people facing homelessness. This includes crisis support, prevention initiatives to stop homelessness before it starts, and advocacy work aimed at driving the systemic change needed to end youth homelessness for good.

Our funding for Centrepoint supports their Independent Living Programme, which creates truly affordable housing to help young people live independently. It also contributes to upgrading existing living spaces and providing vital support with rental deposits, so young people can move on from supported housing and into the private rented sector.



### Helping families facing poverty, in partnership with Action for Children

We have partnered with Action for Children because 4.5 million children in the UK are living in poverty<sup>64</sup>. No child deserves to grow up hungry and cold.

Action for Children helps families that experience financial hardship. They provide services in communities across the UK, giving children, young people and families the practical and emotional support they urgently need.

We are funding Action for Children's Family Fund, which provides emergency funds to families for food, utilities and other essentials, as well as enriching experiences and creating memories to cherish. We are also funding the rollout of Family Clubs in up to 30 locations across the UK, where families can go for help and advice.

<sup>63</sup>Hidden in plain sight: Understanding youth homelessness in the UK

<sup>64</sup>Households below average income (HBAI) statistics - GOV.UK

## About our Nationwide Fairer Futures partnerships and ambitions (continued)



### Helping those living with dementia, in partnership with Dementia UK

We have partnered with Dementia UK, the specialist dementia nursing charity, because one in two of us will be affected by dementia in our lifetime<sup>65</sup> – and no-one should face dementia alone.

Dementia UK is the specialist dementia nursing charity. Its specialist nurses, known as Admiral Nurses, provide free, tailored advice and support to help families care for their loved one, and empower people to have the best life possible, for as long as possible.

We are funding 30 Admiral Nurse roles<sup>66</sup>, that provide dementia specialist support through branch clinics and across the Dementia UK helpline. Over the year, we booked over 1,400 dementia clinic appointments in more than 120 of our branches across the UK.



### Helping those affected by cancer, in partnership with The Royal Marsden Cancer Charity

In April 2025, we partnered with The Royal Marsden Cancer Charity. In the UK, 45 people are diagnosed with cancer every hour. That is more than 7,500 people every week hearing the devastating news that they have cancer<sup>67</sup>. Our support for the pioneering research led by The Royal Marsden NHS Foundation Trust has the potential to create fairer futures for everyone affected by cancer.

The Royal Marsden is a specialist cancer centre that brings together world-class researchers and dedicated clinical teams providing expert compassionate care. Together, with its academic partner, The Institute of Cancer Research (ICR), London, it is internationally recognised for the impact of its research.

We are funding specialist research staff at The Royal Marsden Cancer Charity, with the aim of developing more effective, personalised treatments that save and improve the lives of cancer patients.

<sup>65</sup>Our strategy and annual reports - Dementia UK

<sup>66</sup>We are funding 18 nurses who run dementia clinics in our Nationwide branches, ten nurses who support the Dementia UK helpline, and two "Dementia at Work" nurses based at Nationwide's head office in Swindon, who provide workplace or virtual clinics for colleagues and deliver training and resources that benefit both customers and staff.

<sup>67</sup>[UK cancer statistics | World Cancer Research Fund](#)

## The impact of our Nationwide Fairer Futures activity

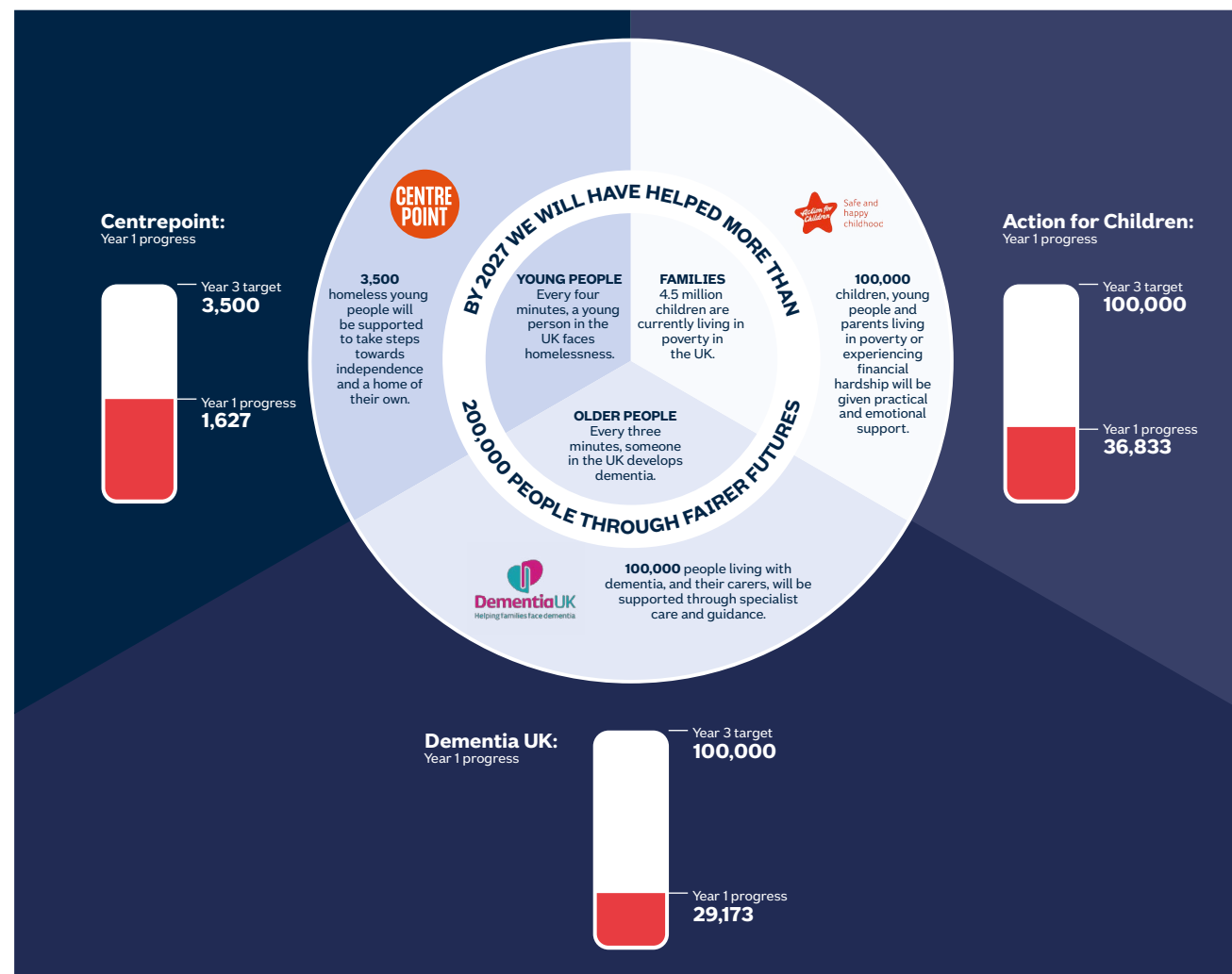
Following the launch of Nationwide Fairer Futures, we have introduced a new target to demonstrate the reach and impact of the transformational programmes we are funding.

**By 2027, we will have helped more than 200,000 people through our Nationwide Fairer Futures social impact strategy<sup>68</sup>**

This target measures our reach, and tracks the number of individual beneficiaries across three of our charity partnerships: Centrepoint, Action for Children, and Dementia UK. Our partnership with The Royal Marsden Cancer Charity is not included in the measurement of this target as we are funding research studies and clinical trials which, by their nature, contribute towards knowledge advancement, rather than measuring the number of people reached.

The diagram opposite illustrates how our 2027 target is split between three of our charity partnerships, and the progress we have made this year.

In the first year of Nationwide Fairer Futures (2024/25), our focus was on launching our charity partnerships, including raising awareness among customers and colleagues, and developing key programmes with our partners. Across this year, we have made significant progress against the delivery of Nationwide Fairer Futures, and we are tracking positively towards our three-year target.



<sup>68</sup>This measure is set against a baseline of 1 April 2024. It is tracked with the support of a third party, Chrysalis Research, who have worked with each charity partner to implement a reporting framework to accurately identify unique beneficiaries from the Nationwide Fairer Futures funded programmes. The data is collected and analysed on a quarterly basis.

## We are proud of the impact we have made over the year.

The information below provides detail on the programmes we have supported, alongside case studies that demonstrate their impact.



### Our partnership with Centrepoint

Programmes we supported this year

#### More Than a Roof

The refurbishment for Centrepoint's housing services. The programme aims to create better environments for young people who have faced homelessness, so they can feel safe to heal from past trauma and work towards securing independence. In addition, through Centrepoint's partnering network, grants are provided to young people to personalise their rooms and transform their own spaces.

##### 18-year-old, living in a home owned by Centrepoint:

*“I think that living here has definitely helped my wellbeing to improve. Mentally it feels just so much more refreshing to be in an environment like this, I like the wellbeing room so we can take time out for ourselves which is really nice.”*

#### Making Private Renting Work

Provides deposits and support for homeless young people who are ready to leave supported homes and move into the private rented sector.

##### A young mum, supported through Making Private Renting Work:

*“When they told me about the deposit I was like, Oh my God. I was so shocked by it because I've never known anyone to do that. And it has really helped....I was so grateful because otherwise we wouldn't have been able to have a place right now. I just wouldn't have been able to afford it all.”*

#### Style your Space

Provides young people with grants to personalise their home living space and make their home their own.

##### 18-year-old, who received a grant to personalise her room:

*“When I first came, I really hated it. Just waking up there, it wasn't nice and I didn't have my TV at the time, so I just felt like I was kind of locked away. But now I wake up, I've got my nice pillows. It's comfortable, it's cosy there. I just feel a bit more at peace, because it's kind of like my room at my mum's house.”*

#### Stepping Stone Homes

An independent living programme that funds truly affordable new homes for young people, in work or training, who have faced homelessness. We are providing funding to build two new properties and refurbishing one further property, to improve the environment for tenants to feel at home, safe and ready to fulfil their potential.

##### Andrew, living in a Stepping Stone Home:

*“It did feel like a relief, because it really helped me.... There's a community here where you're around other young people. All similar stories, but you're unique in your own way. And you just make friends amongst your differences but similarities, and I think that was special. I'm now in my own property, where I'm safe, secure and grateful.”*



## Our partnership with Action for Children

Programmes we supported this year

### Family Fund

Provides vulnerable families with immediate, flexible funds for helping with essentials like food, bills, clothing and appliances for their homes. It also provides children with access to activities and experiences that they would otherwise go without – a trip to the zoo, school trips, or a birthday cake.

#### Quote from a recently single mum, supporting her son with a medical diagnosis:

“ We got a £250 food voucher from Action for Children – we couldn't have survived without that. I was really panicking about how I was going to feed my child, and I don't know how I would have only for the Family Fund, supported by Nationwide. ”

### Family Clubs

Family Clubs are welcoming, safe spaces in local communities where families can come to eat, get warm and make connections with other families. Parents can access expert, tailored support, and children can play and build confidence.

#### Quote from Children Services Manager, Action for Children:

“ Lots of services tell me that one of their key reasons for wanting to run a Family Club is to reduce the isolation many families experience. Family Club provides the chance to meet and make friends with other families. Many services will run clubs from a community venue, so local families can meet and hopefully continue their friendship after Family Club ends. ”



## Our partnership with Dementia UK

Programmes we supported this year

### In-branch Admiral Nurse clinics

Dementia UK is offering face-to-face clinics with an Admiral Nurse in Nationwide branches across the UK. Appointments can be booked online, or by phone, and are held in a private space within our branches.

#### The wife of a person living with dementia:

“I first heard about the Nationwide clinics on Facebook and decided to book an appointment. The Nationwide branch is in the town centre, so it's very easy to get to and accessible to the local community. I had a 45-minute appointment, and no other healthcare professional has ever given me that much time. It was absolutely amazing to speak to somebody who understood what I was going through and had the time to listen.”

### Helpline and Virtual Clinic Appointments

We fund ten nurses on the Dementia UK Helpline, which offers practical solutions and emotional support to families who often have nowhere else to turn.

#### Anonymous user of Dementia UK helpline:

“Fabulously helpful and so wonderful to be listened to and given support. I was at the end of my tether prior to the call. I left the call feeling much more positive.”

### Dementia at Work

We have two dedicated Dementia at Work Admiral nurses who are supporting our colleagues and wellbeing teams to ensure that colleagues who themselves are affected by the everyday challenges of dementia, have access to specialist support. The nurses are also working with teams across Nationwide to improve how we support vulnerable people, including providing them with advice and guidance on how to support customers with dementia.

#### Nationwide colleague who has been with us for over 20 years:

“My dad and paternal granddad both lived with young-onset dementia. In my dad's case, this was coupled with Parkinson's disease. I expect my fate will be similar to my dad's and granddads, so I booked an Admiral Nurse appointment as I wanted to speak to someone to understand how I can keep myself healthy, and to ensure I have plans in place to have a better, more dignified, more comfortable end of life than my poor dad had. The nurse was compassionate and patient with me, as I was emotional talking about it. She signposted me to various resources and, most importantly, listened to my worries and fears with empathy and kindness. I felt a tremendous weight of hidden fear and guilt lifted from me. I've worked for Nationwide for over 20 years, and meeting the Admiral Nurse is probably the most profoundly impactful conversation I've had at work.”

## Our impact in communities beyond Nationwide Fairer Futures

### UK Youth Poll

In 2025, Nationwide partnered with the University of Glasgow's John Smith Centre, collaborating with leading UK consumer insight provider, Focalldata, to conduct the inaugural UK Youth Poll. The research team held in-depth conversations with young people across the country and conducted a survey with a representative sample of over 2,000 16-29 year-olds.

The poll found that most young people are optimistic about their future and describe themselves as happy. However, financial concerns are the primary source of anxiety for them, and affordable housing was identified as their top policy concern – both topics Nationwide is working hard to address<sup>69</sup>.

At Nationwide, we aim to use this research to better understand the issues young people face today and inform decisions on how we can best support them.

### Championing mental health support

Beyond our Nationwide Fairer Futures strategy, we are championing mental health support.

Research from the Money and Mental Health Policy institute shows that over 1.5 million people in England are experiencing both debt and mental health challenges. Debt and mental health challenges are closely linked – nearly half (46%) of those in debt also experience mental health issues, while almost one in five individuals with mental health challenges find themselves in debt<sup>70</sup>. The findings from the UK Youth Poll also back up the pressing need for integrated support that addresses both financial inclusion and mental health support.

Through Virgin Money, we partner with Mind and SAMH (Scottish Action for Mental Health), to help support people with their mental health. Over the year, Virgin Money raised £161,000 for Mind and SAMH, through colleague fundraising and our matched funding programme (more information on colleague fundraising is on page 30).

Through Virgin Money's charitable donations, we have funded the appointment of a Financial Inclusion Officer at SAMH, and Young People Senior Editor role at Mind.

The appointment of a Financial Inclusion Officer at SAMH aims to promote the delivery of well-rounded support to individuals within our communities. This support will be delivered through three key activities:

- Recruitment of experienced practitioners with a capability in both mental health support and welfare rights, to provide interconnected support.
- Development of a system that enables follow-up consultations, so that individuals receive continuous guidance through periodic check-ins and an option to schedule further consultations.
- Creation of an interactive financial toolkit that offers resources and personalised guidance to equip individuals with the information they need to manage their finances and nurture their mental wellbeing.

The appointment of a Young People Senior Editor Officer role at Mind will help address the mental health crisis among young people, through creating inclusive and accessible content around topics such as coping with self-harm, dealing with anger, building confidence and self-esteem, helping young people navigate Child and

Adult Mental Health Services (CAMHS) and signposting free support.

### Enabling digital skills and financial inclusion

As part of our financial and digital inclusion ambitions (see pages 14 and 15), we are working with the digital inclusion charity Good Things Foundation to help tackle digital poverty, by distributing free, 20GB data-loaded mobile sim cards through our Virgin Money branches as part of the National Databank programme. Our aim is to enable internet access for anyone impacted by data poverty, whether they are a customer or not.

Our specially trained branch colleagues are available to help users register sim cards, show them how to get online, signpost relevant resources<sup>71</sup> and offer tips on how to stay safe when browsing. Over the year, Virgin Money supported around 1,300 people with internet access through our National Databank programme.

In addition, to help customers manage their money online, safely and securely, we provide a range of online banking demos and self-serve webpages on money management.

We are also assisting young people with financial knowledge and skills, including through Nationwide's Money Lessons and Virgin Money's Make my £5 Grow programme (see page 14).

<sup>69</sup>UK Youth Poll 2025

<sup>70</sup>Money and mental health facts and statistics

<sup>71</sup>Resources are signposted through the [Learn My Way | Develop Your Digital Skills](#) platform, delivered in partnership with the Good Things Foundation.

## Colleague grants

As part of our 1% commitment to charitable causes, we awarded over £1.4 million (2024: £947,000) through our annual Colleague Grant programme within the Nationwide sub-group. Our Colleague Grant programme gives colleagues within our Nationwide sub-group, on permanent or fixed-term contracts, the opportunity to apply for a grant between £2,000 and £10,000 to benefit charity organisations that they are actively involved with through volunteering or fundraising.

This year, through the programme, over 160 (2024: 125) charities received grants to support their vital work in local communities across the UK. Charities ranged from those supporting people living with a debilitating medical condition, to sports clubs, youth groups and schools, to those helping people in need with essential items like food and toiletries.

In addition, through the Virgin Money Foundation (see page 33), we awarded around £190,000 in colleague grants, which were focused towards supporting schools or charitable organisations that tackle digital exclusion.



Bernie Allsopp, an Engineer at Nationwide, applied for a Colleague Grant to support Blesma, who are dedicated to assisting serving and ex-service men and women who have suffered life-changing injuries such as limb loss, loss of limb function, or loss of sight. This support is also extended to their family members.

*“As a veteran who has experienced limb loss, Blesma has provided me with invaluable support and guidance when I first became an amputee. In return, I have given back by being there for other veterans in their time of need by providing one-on-one support on their survivor's journey.”*

*The grant will have a meaningful impact on veterans who may have lost a limb. Blesma will use the grant to deliver a tailored programme of activities to support beneficiaries experiencing feelings of loneliness and isolation caused by their injuries and health conditions.”*



Michaela Tapley, Nationwide Branch Manager at Sandwich, applied to support Juvenile Arthritis Research, who help children with Juvenile Idiopathic Arthritis (JIA), a lifelong chronic disability where the body attacks the joints, causing inflammation, severe pain, and reduced mobility.

*“This is an amazing small charity that makes a big difference. They are the only charity in the UK that focuses solely on JIA. My son has JIA, and the support they have provided has been invaluable.”*

The funds will be used to produce “School Toolkits”, providing staff with information to support children with JIA. This will make a fundamental difference to the school experience for those affected as they will feel more supported and understood. In addition, different variations of a “Little Box of Hope” will be produced. These kits are designed for children and teenagers, containing a toy, a story book and support material for families.

## Colleague fundraising and volunteering

We encourage our colleagues to take part in fundraising and volunteering activities. Colleagues can take up to 14 hours (two days) of paid volunteering leave every year<sup>72</sup>.

At our Nationwide sub-group, over 16,000 hours were volunteered in 2024/25 during work time<sup>73</sup>.

As a Group, our colleagues raised around £470,000<sup>74</sup>.

The funds raised by colleagues also included colleague donations from salaries, such as through Payroll Giving. Through Payroll Giving, colleagues can make tax-free donations directly through their monthly pay to any UK-registered charity. The full donation goes straight to their chosen charity and we will pay any administration costs. Last year, colleagues across the Group donated around £150,000 in this way.

Within the Nationwide sub-group, colleagues also have the option to donate the last few pence of their monthly net pay to one of our chosen charities, including our Nationwide Fairer Futures charities (see pages 22 and 23), as part of our Every Penny Helps scheme. Eligible donations are enhanced by 25% through Gift Aid. Last year, colleagues donated more than £24,000 (2023/24: £25,500) to charities in this way (including Gift Aid where eligible).

Around 33% (2023/24: 32%) of colleagues within our Nationwide sub-group recorded that they had taken part in volunteering.

## Public policy advocacy

We use our capability, scale and influence to amplify the work of our Nationwide Fairer Futures charity partners through public policy advocacy. This year, we supported the following initiatives:

- Endorsed Centrepoin's Youth Homelessness Databank in Parliament – an annual study of the number of 16-24 year-olds facing homelessness in the UK.
- Supported the exemption of Centrepoin's Stepping Stone accommodation from the Renters Rights Bill, enabling the sustainability and continuation of the programme as a fixed-term tenancy to help young people transition from supported accommodation to permanent housing<sup>75</sup>.
- Collaborated on the Move On report<sup>76</sup>, which provides evidence on the barriers that young people face in securing stable housing.
- With Action for Children, we supported their 'Paying the Price' research<sup>77</sup>, which models a range of possible policy pathways the government could follow to reach ambitious targets to reduce child poverty.
- For Dementia UK, we helped bring a 'Time for a Cuppa' event to Parliament to raise awareness on the work of Dementia UK among MPs. In addition, we hosted 21 MPs at Nationwide branches to attend our Dementia Clinics (more info on page 27), helping demonstrate the benefits that branches can offer to communities, outside of banking services.

In addition to Nationwide Fairer Futures, we engaged with regulators and policymakers on the key issues around digital and financial inclusion, promoting our work supporting the Nationwide Databank programme (see page 28), as well as other activities aimed at improving financial inclusion, such as our financial education programmes (see page 14).

We have called on the Government, alongside a group of like-minded businesses and charities, for a financial inclusion strategy that recognises the importance of digital inclusion and tackling the poverty premium. In December 2024, the Government established a Financial Inclusion Committee that will help establish its financial inclusion strategy. Amongst its key areas of focus are digital inclusion and access to banking services.

We finalised research<sup>78</sup> in May 2025 that aims to help the Government to better understand the link between digital and financial exclusion and its economic impact.

Virgin Money also became the first member from the banking industry to join the All-Party Parliamentary Group for Digital Inclusion, working alongside other industries to engage with ministers, officials and politicians. Alongside other members, we have called on the Government to deliver a new digital inclusion strategy.

We are largely supportive of the Government's proposed Digital Inclusion Action Plan, published in February 2025, and have responded to the consultation calling for the Plan to provide a multichannel approach to delivering digital inclusion initiatives.

<sup>72</sup>For part time colleagues, this will be pro-rated for their working hours. Volunteering hours need to be taken during an employee's regular working hours.

<sup>73</sup>Based on hours volunteered during work hours for our Nationwide Fairer Futures charity partners and other external charity activities, as logged by colleagues on our volunteering system.

<sup>74</sup>This includes £161,000 raised by Virgin Money colleagues for Mind and SAMH, as referred to on page 28.

<sup>75</sup>The introduction of open-ended tenancies under the Renters Reform Bill could unintentionally alter the core purpose of this programme to act as a temporary service into permanent housing.

<sup>76</sup>[Move on for young people experiencing homelessness in 2023-24 | Centrepoin](#)

<sup>77</sup>[Paying the price of child poverty | Action For Children](#)

<sup>78</sup>[Job not done: younger generations at serious risk of digital and financial exclusion | Virgin Money PLC](#)

# Our support for the Nationwide Foundation

Everyone needs a decent and affordable place to call home for as long as they need it. Yet millions of people in the UK live in unsafe, insecure and unaffordable housing, which can harm their health and wellbeing. The Nationwide Foundation is an independent charity, established by Nationwide in 1997, that is dedicated to tackling these issues by investing in innovative projects, housing pioneers and progressive research to bring transformative change to the UK housing system.

In 2024/25, as part of our commitment to donate at least 1% of our pre-tax profits to good causes, £4.7 million (2023/24: £3.9 million) was awarded to the Nationwide Foundation.

Last year, the Nationwide Foundation completed Phase 3 of its long-term Decent Affordable Homes Strategy, working across three distinct programmes, as shown on this page and the next.

The Nationwide Foundation also launched *Decent and affordable homes for all: five proposals for a fairer housing system*<sup>79</sup>. This report calls for the Government to show bold action to tackle the nation's housing crisis, with five clear recommendations for change.

The Nationwide Foundation is committed to its Decent Affordable Homes strategy until at least 2031. The fourth phase of the strategy is currently under development, but the Nationwide Foundation will seek to make the most of its reach, assets and intermediary role to:

- convene coalitions of different voices and call for change
- invest in pioneering research
- build an evidence base to hold the UK governments to account and offer solutions
- test new ideas to build understanding of what works
- build new narratives to support positive behaviour change in housing.

## The three programmes in Phase 3 of the Nationwide Foundation's long-term Decent Affordable Homes Strategy

### 1. Nurturing ideas to change the housing system

This programme supports innovative solutions to change the housing system, so that more decent and affordable homes are available for those most in need.

In 2024/25, this included:

- Launching the Homes for All coalition, in partnership with the Church of England and supported by partners across the housing sector. Through Homes for All, the Nationwide Foundation has been campaigning for a cross-party, long-term housing strategy to transform England's housing system. Critically, it provides 25 key outcomes needed for a well-functioning housing system, including quality, affordability, tenure and community.
- Hosting a panel discussion at the Labour Party Conference, featuring several MPs, including the Minister for Housing and Planning, Matthew Pennycook MP, with Homes for All leading the conversation.
- Continuing work with 'We Can Make', a pioneering affordable housing project that has created a new supply of land in Bristol by using back gardens in post-war housing estates to address local housing need. We are working with the project to adapt and adopt the model to other areas around the country.

### 2. Backing community-led housing

Community-led housing gives communities the power to create decent, affordable homes in the places where they are wanted and needed. The Nationwide Foundation is a major funder of this sector.

In 2024/25, this included:

- Co-funding significant new research into the challenges faced by black and minority ethnic communities within the community-led housing sector. In response to the findings, the Nationwide Foundation acknowledged its role in empowering black and minority ethnic communities to build better homes and stronger communities.
- Working alongside our sector partners to advocate for policy change to help the community-led housing sector achieve its potential.
- Increasing its investment in sector innovation so local delivery schemes have the potential to deliver community-led housing at a significant scale. This includes strategic partnerships with the devolved nations' governments in Wales and Scotland.

<sup>79</sup>[Decent and affordable homes for all: five proposals for a fairer housing system - Nationwide Foundation](#)

### 3. Transforming the private rented sector

The Nationwide Foundation campaigns and funds other organisations to reform the private rented sector (PRS) so that it provides more affordable, secure and decent-quality homes.

In 2024/25, this included:

- Publishing groundbreaking new research into Scottish tenancy reform, providing crucial insights into the impact of PRS legislation. The Nationwide Foundation and researchers gave evidence on the research to both the UK and Scottish parliaments.
- Funding, and being a key member of, the Renters Reform Coalition (RRC), a group of organisations supporting private renters. The Renters' Rights Bill was brought forward this year, marking a fundamental shift in tenant rights, much of which is a direct result of RRC campaigning.
- Launching a long-term programme of research into the English PRS, beginning with a focus on the regulation, behaviour and impacts of different agencies within the PRS space.
- Continuing to support influential projects that help UK renters make their voices heard. Key successes included the Good Landlord Charter (through work with the Greater Manchester Tenants Union) and the Scottish Housing Bill (through work with the campaign group Living Rent in Scotland).

# Our support for the Virgin Money Foundation

The Virgin Money Foundation is a charitable Foundation set up by Virgin Money to support communities where its colleagues live and work. Since its launch in 2015, the Virgin Money Foundation has awarded over £16 million to charities and community organisations working to create positive change in their local community.

In January 2024, the Virgin Money Foundation launched its new strategy, focused on tackling digital poverty through three key workstreams, as shown below.

## 1. Building Digital Skills Fund

This multi-year fund supports community organisations in the North-East of England and Glasgow who work directly with those most digitally excluded and in the top 20% of the Index of Multiple Deprivation or Scottish Index of Deprivation.

Organisations can apply for a grant of up to £100,000 to address digital poverty in their local community, by creating tailored support programmes that enable access to digital technology and connectivity, and support to increase online skills and confidence.

Between 1 October 2024 and 31 March 2025, around £555,000 was awarded in grants to organisations across North-East England and Glasgow, who are working to boost digital skills and confidence, and provide access to affordable data, broadband and digital equipment. The funding is expected to support more than 3,500 people in this way<sup>80</sup>.

## 2. Volunteer and Connect Fund

Virgin Money colleagues who volunteer in a school can apply for a grant of up to £5,000 to support the school in addressing digital poverty with their pupils and their families.

Digital poverty does not only affect adults, 20% of children in the UK live in digital poverty<sup>81</sup>. The funds can be used by schools to support families facing digital poverty, by purchasing new devices and software or accessing digital training.

Between 1 October 2024 and 31 March 2025, around £190,000 was awarded in grants to schools. Teachers have told us that the grants will support around 15,000 children with digital access, skills and confidence.

## 3. Digital Champions Programme

The Digital Champions Programme is a volunteering initiative that trains Virgin Money colleagues as Digital Champions, enabling them to volunteer in their local foodbank and other local charitable organisations to assist people with immediate digital needs. Alongside the volunteer support, the Virgin Money Foundation also donates a laptop to the charity, reflecting its ambition of creating digital inclusion in our communities.

Between 1 October 2024 and 31 March 2025, around 145 Virgin Money colleagues have been trained as digital champions, supporting around 800 individuals<sup>82</sup>.

<sup>80</sup>This figure is based on projections supplied by the grantees, estimating the number of individuals expected to benefit from the awarded grants.

<sup>81</sup>Digital Poverty in the UK: A socio-economic assessment of the implications of digital poverty in the UK – Digital Poverty Alliance

<sup>82</sup>The number of individuals who have received support with their digital needs, either through individual or group sessions with trained Digital Champions.

## 4. We aim to build a more sustainable world by supporting progress towards a greener society

Our full Climate-related Financial Disclosures 2025 can be found at [Results and accounts | Nationwide](#)

### Our environmental impact

Environmental and climate consciousness are aligned to our purpose, supported by our Beacon for mutual good strategic driver, and our Mutual Good Commitment – we aim to build a more sustainable world by supporting progress towards a greener society. This compels us to take meaningful action by limiting the environmental impact of our business operations, helping customers to green their homes and businesses, and managing better the impacts of a more unpredictable climate.

Climate change continues to present a risk to us and our customers, and so managing the risk from climate change and nature is core to us being a responsible business.

### Enhancing our climate- and nature-related risk capabilities

In 2024/25, we continued to develop our management of environmental risk. We manage climate change-related risk as part of our Enterprise Risk Management Framework (ERMF) approach<sup>83</sup>. This supports appropriate identification, monitoring, management and reporting across all principal risk categories, along with full traceability.

We are becoming increasingly focused on nature-related risk. This year, we have started to consider our dependency upon, and potential impacts from, nature, as a cause to the Nationwide sub-group's principal risks.

In 2024/25, the Nationwide sub-group undertook an assessment based on the Taskforce on Nature-related Financial Disclosures (TNFD's) LEAP approach<sup>84</sup> to develop our understanding of nature-related risks across our business operations and supply chain, using data from the World Wildlife Fund's (WWF's) Biodiversity Risk Filter.

We anticipate our understanding of nature-related risk, and the ways in which it could impact us, including across our business lending portfolios, will continue to evolve.

Further information on our approach to climate- and nature-related risk is in our Climate-related Financial Disclosures 2025, from page 10.

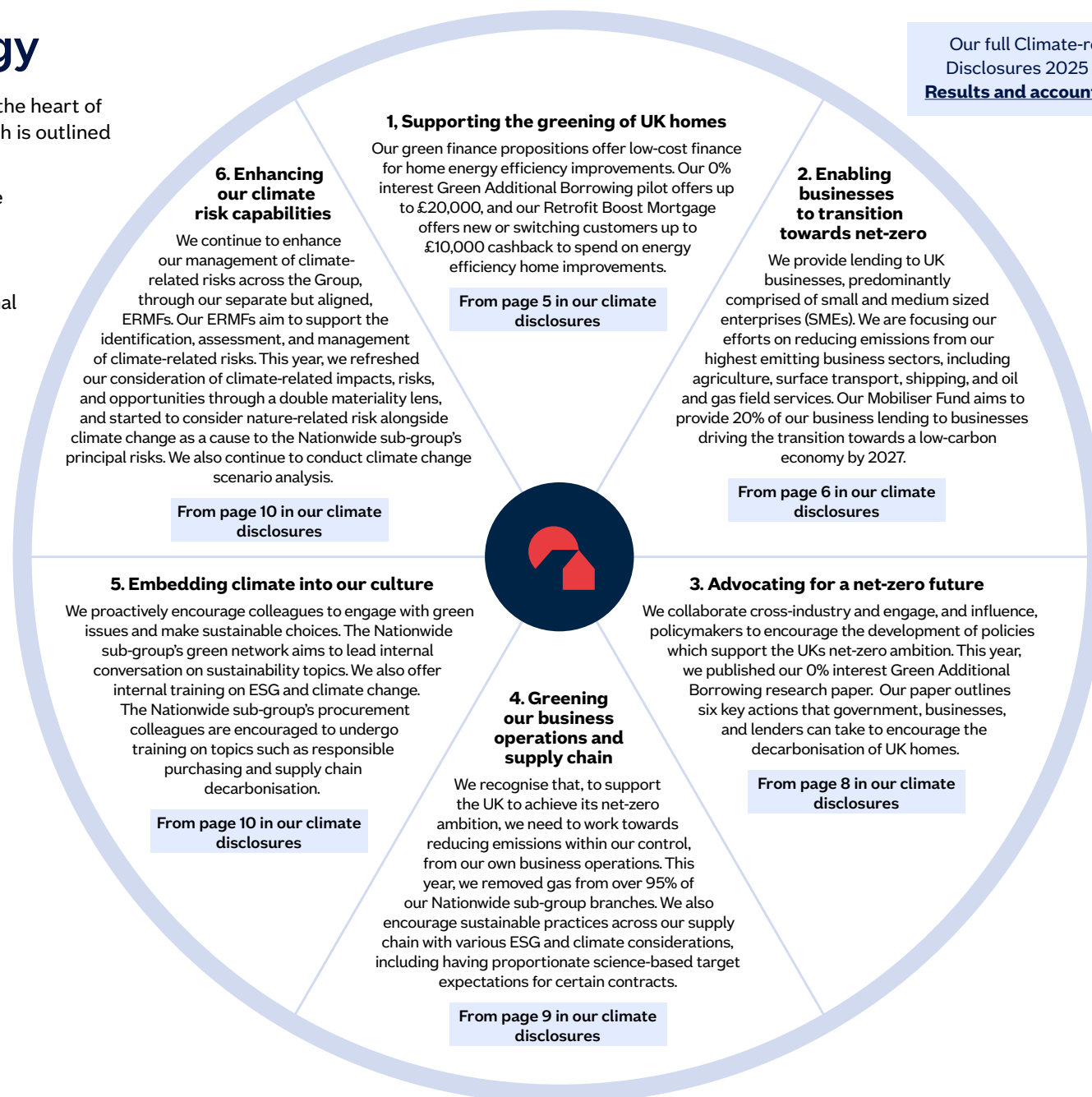
<sup>83</sup>The Nationwide and Virgin Money sub-groups operate separate but aligned ERMFs. The Nationwide sub-group considers climate change as a cause to its principal risks and the Virgin Money sub-group currently considers climate change as a risk. We will align approaches across the Group in the future.

<sup>84</sup>The LEAP approach (Locate, Evaluate, Assess and Prepare) is a framework designed by the TNFD to help identify, assess, manage, and disclose nature-related risks.

# Our climate strategy

Our customers and wider stakeholders are at the heart of our purpose-led climate change strategy, which is outlined in the diagram opposite.

The six pillars of our strategy highlight how we engage with our customers and stakeholders on climate change, and summarises our key activities in 2024/25. Page number references have been provided to indicate where additional detail can be found in our Climate-related Financial Disclosures 2025.



## 5. We will enhance our performance by better reflecting the diversity of our society

Inclusion is key to being a modern mutual. We want to ensure that we have an inclusive culture where everyone can thrive, and that we enhance our performance by ensuring our workforce better reflects the diversity of our society. Having a diverse range of perspectives, skills and experiences will help us continue to benefit our customers, through offering the products and leading levels of service that matter most to them.

### Progressing inclusion and diversity

This year, we published our Group diversity measures across gender, ethnicity and disability (see page 24 of our Annual Report and Accounts 2025).

By combining data across the Group, we have seen an overall reduction in the diversity of our all-colleague population, but an increase in the diversity of our senior leader population, when compared to 2024 data for the Nationwide sub-group only. We are committed to identifying where focus and action are needed to design inclusion into our processes, policies and practices. We will also continue to enhance our evaluation of data, to better understand the impacts of the targeted, supportive interventions we take.

We have made progress in the diverse representation of colleagues at our Nationwide sub-group, achieving five of our seven diversity measures to meet by 2025 (see page 64). We will be reviewing our diversity measures to set appropriate targets for the Group going forward.

Our Board is committed to progressing our inclusion and diversity approach and receives regular updates on our diversity measures. Diversity measures around gender and ethnicity at senior levels form part of our Directors' Long-Term Performance Pay awards (see pages 92 to 117 of our Annual Report and Accounts 2025).

Our senior leaders are also accountable for driving our inclusive culture, and inclusion and diversity data is made available to them to enable better-informed action. For example, we are expanding availability of our data, including providing some leaders with access to anonymised and aggregated Culture Survey results by demographics, so they can better understand variations in experiences, and implement appropriate actions within their teams.

We continue to embed inclusive practices and initiatives into our Group strategy, including through our policies, processes and propositions. Together with our employee networks (see page 37), we focus on initiatives that support our ambition of being an inclusive employer.

We remain committed to reducing our gender pay gaps. Our mean gender pay gaps decreased at both our Nationwide and Virgin Money sub-groups. This was driven by demographic changes, through more gender-balanced hiring. Our latest gender pay gaps report can be found on our website<sup>85</sup>. In addition, our Nationwide sub-group published its ethnicity pay gap, which slightly increased. This was driven by an increase in the

proportion of ethnically diverse colleagues in customer-facing and support roles, slightly offset by an increase in ethnically diverse colleagues in specialist, manager and leadership roles.

In the 2025 Financial Times' Diversity Leaders list, our Nationwide brand ranked fifth out of 850 organisations and was the highest-ranked UK high street financial services provider for the fourth year running<sup>86</sup>. In the FTSE Women Leaders Report<sup>87</sup>, we ranked joint fifth for female representation on our Board of Directors across 50 of the UK's largest private businesses.

We aim to ensure everyone has access to opportunities. It is our policy to afford access to training, career development, and promotion opportunities fairly to all colleagues. We are recognised as a Disability Confident Leader, the highest level under the Disability Confident scheme introduced by the Government's Department for Work and Pensions. More on our approach to supporting colleagues with disabilities and long-term health conditions can be found on page 35 of our Annual Report and Accounts 2025.

### Inclusive career development

Our colleagues are at the core of serving our customers and delivering our strategy. We are committed to building a high-performing, customer-first, inclusive culture, where colleagues thrive and develop rewarding careers.

<sup>85</sup>Pay gaps at Nationwide: [Gender-and-ethnicity-pay-gap-report-2024.pdf](#). Pay gaps at Virgin Money: [Gender-pay-gap-report-2024.pdf](#)

<sup>86</sup>The FT-Statista ranking of Europe's Diversity Leaders is based on independent surveys of more than 100,000 employees across Europe, on their perceptions of their organisation's diversity and inclusion practices. Surveys were conducted in the period from April to July 2024. Employee surveys accounted for 70% of the final score, and three indicators accounted for 30% of the score (the share of women in management positions, the communications made in favour of diversity, and a diversity score calculated by data provider Denominator).

<sup>87</sup>FTSE Women Leaders Review (February 2025)

We provide a range of opportunities for colleagues to learn, grow, and succeed at every level. In addition to developing skills through our internal learning and opportunities platforms, we provide broader career growth and development opportunities, including early career programmes, manager and leadership development, and re-skilling initiatives for colleagues.

We are signed up to government support initiatives to further the progression and inclusion of under-represented colleagues, including the Women in Finance Charter, Race at Work Charter, and the Parker Review.

Over the year, we focused on career development opportunities and initiatives for underrepresented groups, and improving recruitment and onboarding processes, to better enable an inclusive experience and to strengthen the diversity of our recruitment pipeline, by putting inclusion at the heart of our process design. For example, at our Nationwide sub-group, we removed from our graduate programme the requirement for applicants to have a university degree. And we shifted from a traditional graduate programme to a more inclusive skills development programme that focuses on developing targeted skills for specific roles.

We continued our partnership with the 10,000 Interns Foundation, supporting their Black Interns programme by offering paid work experience, training and development for candidates. In addition, at our Nationwide sub-group, we broadened our intern programme to include students from low socio-economic backgrounds. This year, in total, we welcomed around 75 interns across the Group.

Our early career propositions also included our Nationwide Scholarship programme, launched in April 2024 in partnership with the financial education platform Blackbullion. This provided financial support to six students from low socio-economic backgrounds through their university degree. In October 2024, our

Nationwide sub-group supported five of our colleagues who were a part of our employee Social Mobility Network to participate in a Chartered Management Degree Apprenticeship, in partnership with Cranfield University.

In May 2024, through our partnership with Progress Together, a membership body centred on progression, retention and socio-economic diversity in financial services, our Nationwide sub-group launched its Accelerated Progress Programme. This is a twelve-month development programme, providing opportunities for colleagues from low socio-economic backgrounds to develop business critical skills and build connections across the industry.

We also offered mentoring programmes to support inclusive development. For example, within our Nationwide sub-group, this included piloting a multicompany mentoring programme ('Trailblazers') that aims to remove socio-economic, cultural and social capital barriers, and equip individuals with diverse backgrounds with the skills and confidence to transition into middle management roles. At Virgin Money, it included our reciprocal mentoring programme ('BRAVER Connections') that connects colleagues from underrepresented backgrounds with a senior leader to support a two-way learning experience and enable a more inclusive culture, as well as our 'Vibrant Career Sponsorship Programme' that carefully matches LGBTQ+ colleagues and allies with a senior leader who offers sponsorship, career guidance, advocacy and visibility within the business.

### Working with our employee networks

Our employee networks bring together colleagues, including those who share similar characteristics or life experiences and who want to connect with others, as well as welcoming allies. They help us learn from lived experiences, fostering a supportive community and promoting belonging and inclusion. They focus on

initiatives that support our ambition of being an inclusive employer.

Nationwide and Virgin Money currently operate separate employee network groups. Together they cover disability, faith and belief, gender, LGBTQ+, race and ethnicity, social mobility, sustainability, veterans and reservists, wellbeing, working carers, and working families. Our networks celebrate and develop awareness for inclusion, diversity, equity and wellbeing, and promote increased allyship and understanding across the Group.

Within our networks, we have informal support groups, offering colleagues the opportunity to come together and help each other with their careers and wellbeing around specific contexts. In the past, this has included discussions around men's mental health, baby loss and fertility, menopause and more. Colleague volunteers have trained and taken on supportive roles, such as workplace menopause coaches, healthy mind champions and mental health first aiders.

We continue to collaborate with our employee networks to help shape our inclusion, diversity and wellbeing approach and propositions, including supportive enhancements to policies. This has previously included our domestic abuse and becoming a parent policies, among others. Last year, our networks helped to develop our People Narrative and strategy. We also completed a number of external benchmarking submissions in collaboration with our networks, such as the Social Mobility Index and the Investing in Ethnicity submission.

Our employee networks also seek to build inclusivity across our wider communities. Nationwide was the headline sponsor of Swindon and Wiltshire Pride 2024, showcasing our support for the LGBTQ+ community, while Virgin Money was a key sponsor of the Black Talent awards, recognising and celebrating the achievements of Black Professionals across various industries.

## Partnering to accelerate our diversity ambitions

We have a range of social partnerships and commitments that support us in driving forward our inclusion and diversity ambitions. In 2024/25, examples of these included:

- Armed Forces Covenant
- Business Disability Forum
- Disability Confident Scheme
- FTSE Women Leaders Review
- The 10,000 Black Interns Programme
- Parker Review
- Race at Work Charter
- Women in Finance Charter
- 30% Club
- Employers for Carers
- Endometriosis UK
- Menopause Friendly Employer (Henpicked)
- Progress Together
- Social Mobility Index
- Valuable 500
- Working Families

## Our approach to dealing with discrimination

We do not tolerate prejudice, discrimination or harassment in any form. Our purpose ensures that inclusion is central to what we do: Banking – but fairer, more rewarding, and for the good of society.

We want to have a culture in which diversity and inclusion are valued, with an appreciation for each other's differences and where our colleagues and customers are treated with dignity and respect.

We are committed to giving everyone an equal opportunity, regardless of background or characteristic, and to eliminating discrimination.

We have a suite of policies that are designed to help prevent discrimination and harassment, and provide clear procedures to investigate, address, remediate and learn from any incidences, and to ensure all colleagues are treated with respect and dignity.

More information on our approach can be found on our website<sup>88</sup>.

## The composition of our workforce

As at 31 March 2025, we had around 26,000 permanent employees across the Group. We offer a choice of working patterns, providing flexibility to our colleagues. Of our permanent employees, 79% work full time.

Over the year, our total turnover of colleagues was 11.5% at our Nationwide sub-group and 8.6% at Virgin Money. Voluntary turnover was 8.6% at our Nationwide sub-group and 5.6% at Virgin Money<sup>89</sup>. More information on how we manage change can be found on page 42.

Our average absence rate over 2024/25 was 4.9% at our Nationwide sub-group and 3.6% at Virgin Money. More on our approach to improving attendance can be found on page 52.

## Diversity of the Nationwide Board

We are committed to having an inclusive and diverse Board to set the Group's strategy, tone and culture. The Board aims to achieve this by ensuring there is a diverse range of backgrounds and balance of skills, experience and knowledge.

This is a key determinant of any new Board appointment and is also taken into consideration in the development of a diverse pipeline for succession. Selecting the best candidate is paramount and all appointments are based on merit and objective criteria, with due regard for the

benefits of diversity, including diversity on the Board. This approach benefits the effectiveness of the Board by creating diversity of thought and breadth of perspective among directors. The Board's Diversity Statement is set out in the Board Composition and Succession Policy which can be found at nationwide.co.uk.

As of 31 March 2025, the diversity of our Board exceeded the FCA's Board diversity targets, of having a minimum of 40% female representation, at least one senior Board position held by a woman, and at least one director from a minority ethnic background. Our Board diversity data can be found on pages 72 to 74 of our Annual Report and Accounts 2025.

<sup>88</sup>Discrimination policy statement | Nationwide

<sup>89</sup>Total turnover and voluntary turnover at Virgin Money covers the period from 1 October 2024 to 31 March 2025.

# Supporting our colleagues

Our colleagues are at the core of serving our customers and delivering our strategy. We are committed to building a high-performing, customer-first, inclusive culture, where colleagues thrive and develop rewarding careers.

## Connecting with our colleagues

We invite all colleagues to share their views on working at Nationwide, the challenges they face and what works well. We do this through surveys, listening events, including with the Group Chief Executive Officer and executive management, and through engagement with Employee Network Groups and staff unions. The Board also visited colleagues in branches, to hear directly about the issues that matter to them.

Our colleagues are highly engaged with our culture and strategic direction, and we benchmark favourably against our financial services peers. In our Group colleague culture survey in March 2025, our colleague engagement index was 83%, 4%pts above the financial services benchmark and 2%pts above the high performing benchmark. The highest scoring component of our colleague index related to colleagues enjoying work and feeling a connection to Nationwide's purpose.

The Group's culture remains an important focus of the Board. Our Board and Executive Committees regularly discuss the outputs of our culture surveys and colleague feedback to understand what our colleagues really value. This helps to inform and shape strategic decisions and initiatives that drive meaningful change within the Group.

The Board has an appointed non-executive director with specific responsibilities for the Employee Voice in the boardroom. This role is held by Tamara Rajah, who works with the People function and reports to the Board on an annual basis. This year, this was supplemented by updates presented to the Board by both the Group

Chief Executive Officer and Virgin Money Chief Executive Officer on employee sentiment collated since the Virgin Money acquisition.

## Engaging our colleagues with our purpose, strategy and values

On 1 October 2024, we completed the acquisition of Virgin Money. Throughout the acquisition process and over the last six months since, we have shared regular communications to keep colleagues informed and showcase the opportunity that our combined business presents.

We also developed a Group purpose, strategy and set of behaviours (page 50) that Nationwide and Virgin Money can unite behind, putting customers at the heart of everything we do. We engaged our senior leaders and then all colleagues through a series of immersive events, to build clarity, connection and commitment to our future direction and shared ambition as a combined Group.

We continue to embed our performance management framework, driving high performance and linking colleagues' performance goals to the delivery of our strategy, and overlaid with our behavioural framework, to focus on both what we do and how we do it. The continued embedding of this framework strengthens colleague understanding of how individual performance contributes to Nationwide's success.

As a result, colleagues are clear on expectations and priorities, and regular engagement with colleagues through our quarterly surveys provides insight on how our culture is progressing. Our cultural transformation is

supporting the successful delivery of our strategy.

More information on our performance framework can be found on pages 40 to 41, under Fair and transparent reward.

## Supporting our colleagues' wellbeing

We maintain a continuous focus on providing our colleagues with support for their physical, mental, emotional, social and financial wellbeing.

All colleagues have access to employee assistance helplines, available 24/7, that can provide free counselling, health and wellbeing advice, legal information, and a debt support service.

Colleagues have access to our healthcare plans. They can also make choices to purchase a range of benefits through our voluntary benefits platforms, including additional pension contributions, protection (for example, critical illness cover, life assurance), lifestyle (such as buying holidays, discounted gym membership) and healthcare (cancer screenings, health assessments, private dental cover). Over 2024, around 70% of all our colleagues across the Group made selections from our range of benefits. Colleagues also have access to discounted health and fitness plans, further supporting their wellbeing.

We provide mental health support for all colleagues, including specific resources for people leaders to help support their teams. We have dedicated mental wellbeing networks to provide a supportive, non-judgemental and confidential listening space, and signposting to further help where needed.

Our networks provide regular information on supportive resources, collated in collaboration with numerous sources including Mental Health First Aid England, Mind, SAMH and Rethink. The resources cover multiple topics, including, but not limited to, abuse, anxiety, addiction, bereavement, money, debt and mental health, menopause, and stress. Our Nationwide sub-group was awarded the Mental Health First Aid award in the Inside Out Awards 2024.

In January 2025, we launched a new mental health and wellbeing platform to colleagues within our Nationwide sub-group. Through the platform – JAAQ (Just Ask A Question) – colleagues can explore mental health topics, ask questions, and get answers from world-class experts and people with lived experience.

We are committed to taking positive action to ensure our workplace is supportive and understanding of anyone affected by menopause. Colleagues and managers have access to comprehensive guidance on menopause. We also have around 45 menopause coaches trained to support colleagues, and we provide spaces to enable colleagues to connect and share experiences, for example through menopause coffee chats.

We will always look to support colleagues experiencing domestic abuse. Our Nationwide sub-group has a supportive policy for domestic abuse, which includes access to mental health, legal and financial support services and the ability to change working arrangements and relocate, if required. Colleagues can access one-to-one support through an independent domestic abuse consultant. We have a dedicated team of around ten colleagues trained as Domestic Abuse Allies, who can provide confidential support and guidance.

### Family friendly policies

We offer a supportive range of family-friendly leave.

Birth parents are entitled to 52 weeks of leave, with a period of at least 20 weeks of fully paid leave for

colleagues across the Group. We also have a co-parent full-pay offering above the statutory minimum. The same benefits are applicable to adopting and long-term fostering parents, and those adopting through surrogacy. All colleagues receive full pay when attending pregnancy-related appointments. We also provide additional leave and pay in the event of premature and neonatal births.

In addition to public holidays, colleagues are entitled to between 25 and 30 days of holiday per year, with options to purchase additional days of annual leave through our voluntary benefits platforms. We also support our colleagues with paid leave in the unfortunate event of bereavement.

In addition, we encourage colleagues to play their part in society and support armed forces reservists and emergency service personnel by offering flexible leave options. All colleagues are offered two days of paid volunteering leave. More information on volunteering can be found on page 30.

### Supporting carers

The most recent Census 2021 suggests that there are 5.8 million unpaid carers across the UK<sup>90</sup>. We recognise the emotional and physical impact that caring for someone can have. We are proud of our support for colleagues who are also carers, including through offering them unpaid leave to support with their day-to-day caring activities.

In addition to leave, we offer colleagues additional support with caring responsibilities through our specialist third party care service offering. This provides a range of services, including expert advice and one-to-one personalised support, and a suite of digital tools and resources, ensuring colleagues have access to the resources they need to manage their caregiving duties effectively.

In June 2024, as part of our Nationwide Fairer Futures programme (see pages 22 and 23) and partnership with

Dementia UK, we introduced two dedicated Admiral Nurses to support colleagues who are helping someone with dementia, or who are worried about symptoms in themselves or loved ones. Colleagues diagnosed with dementia themselves are also offered support.

Nationwide has been re-accredited by the Employers for Carers benchmarking scheme, achieving Carer Confident Level 3 Ambassador status. This is the highest level of accreditation, and we are one of only 14 organisations in the UK to achieve this, reflecting our commitment to championing carers internally and externally.

### Fair and transparent reward

We are committed to paying our colleagues fairly for the work they do and the contribution they make, taking into account their experience and skills, and informed by external market benchmarking and the salary of colleagues doing similar roles. We carry out regular equal pay audits, checking the pay of people with different characteristics (such as gender and ethnicity) doing the same or similar roles. Our audits continue to show that our pay policies are operating fairly.

We embrace the commitment to pay the real Living Wage for all our employees who we hire directly, which includes apprentices, temporary workers, and contractors, going further than the Government's National Living Wage. We review our pay levels annually, informed by external market movements and changes in living wage. Our Nationwide sub-group has been an accredited Living Wage Employer and a Principal Partner of the Living Wage Foundation since 2014.

Within our Nationwide sub-group, we also encourage third-party suppliers to pay the real Living Wage through our Third Party Code of Practice, our tender questions, and our standard contractual terms.

Equal pay is different to pay gaps, which measure the difference in earnings between different groups across all roles. More on our gender and ethnicity pay gaps can be found on our website<sup>91</sup>.

<sup>90</sup>Key facts and figures | Carers UK

<sup>91</sup>Pay gaps at Nationwide: [Gender-and-ethnicity-pay-gap-report-2024.pdf](#); Pay gaps at Virgin Money: [Gender-pay-gap-report-2024.pdf](#)

Following our acquisition of Virgin Money on 1 October 2024, to provide a level of consistency and stability for colleagues, there were no immediate changes to the broad approach to remuneration for any employees within the Group.

Our approach to variable pay arrangements for our wider workforce for 2025/26 continues to support the delivery of Nationwide's strategy and purpose, whilst enabling us to differentiate reward outcomes based on colleague performance and behaviours. Eligible colleagues within the Nationwide sub-group also received an Annual Performance Pay award. A similar construct applies for Virgin Money colleagues, supporting consistency across the Group. Performance measures are communicated to all colleagues, ensuring clear alignment and focus across Nationwide in delivering against our strategic drivers and for our customers.

More information on reward can be found in the Report of the directors on remuneration, on pages 92 to 117 of our Annual Report and Accounts 2025. Information on the alignment of remuneration with the delivery of ESG measures can be found on page 48 of this report.

We offer our colleagues access to highly competitive pension schemes to help them plan for the future. Nationwide sub-group colleagues are enrolled into the Nationwide Group Personal Pension (GPP), managed by Aviva. The contributions made into the GPP are among the best in the market, paying 13% of basic salary when an employee contributes 4%. Nationwide's contribution rises to 16% when colleagues increase their contribution to 7%. Virgin Money sub-group colleagues are enrolled into the Virgin Money Retirement Savings Plan, managed by Virgin Money via an independent board of Trustees. Investments are accessed via Fidelity's investment platform. Contributions pay up to 13% of basic salary, when an employee contributes 7%.

Colleagues within our Group are entitled to a generous life assurance benefit of between four and eight times salary.

### Supporting performance and development

All our employees have opportunities to grow their skills and develop their careers. This maximises our organisational capability, supports individual growth, and makes sure we can deliver the best outcomes for our customers and for achieving our Group strategic goals.

All colleagues receive performance reviews at least annually to aid their own personal development ambitions as well as progress towards the Group's strategic goals.

At our Nationwide sub-group, over 2024/25, around 1,000,000 (2024: 1,100,000) total learning hours were completed by colleagues, equating to, on average, 58 (2024: 61) hours per person. The key themes were technical and role-specific learning (60% of hours), talent development (18%), and leadership and management learning (10%). Over the year, we invested around £590 (2024: £714) per employee in external training, professional development and coaching. In that time, we have worked with a selection of external suppliers and partners, including QA Ltd, Accenture, ME Learning, ICA Commercial Services and Udemy.

### Developing our digital development curriculum:

Through strategic workforce planning, and engagement with the Financial Services Skills Commission, we continue to develop our digital skills strategy. Our partnership with the FutureDotNow industry coalition has enabled colleagues within our Nationwide sub-group to learn essential digital skills. This has been further supported by an 'Artificial Intelligence (AI) at Nationwide' learning pathway, which is helping colleagues understand the benefits of generative AI and how to use it responsibly. In January 2025, we launched Skills Matter

learning pathways, covering customer relationship management, data and insight, and digital skills. Each pathway was also designed to enhance inclusive practices. Since its launch, around 1,500 colleagues within our Nationwide sub-group have completed Skills Matter learning materials.

### Leadership and people management programmes:

Our leaders and people managers are essential in fostering the culture and capabilities necessary for our organisation's growth and relevance.

Over the year, we continued to enrol colleagues in our leadership and people manager programmes across the Group.

Our leadership development programme is focused on developing commercial and business leadership skills, and skills for building inclusive, high-performing teams. Around 85% of senior leaders within our Nationwide sub-group have now either completed the programme, which first launched in 2023, or are currently participating in it. In addition, more than 2,000 people managers (equating to around 75% of the people manager population) across our Nationwide sub-group have now completed our People Manager Programme. Our People Manager Programme achieved City & Guilds ILM Assured status, demonstrating its quality.

At Virgin Money, we continued to build our people leader capability through a range of online and facilitated leadership development opportunities. Additionally, we have refreshed our offering for new-to-role people leaders with our Accelerate programme. This programme is focused on the fundamentals of people leadership such as performance management, ways of working, motivation drivers and handling difficult conversations. Around 220 new people managers have completed this programme, since its launch in January 2024.

### Stretch opportunities and succession plans:

We provide stretch to those who have the potential and aspiration to broaden their leadership skills and knowledge. We have implemented succession plans across key roles, in line with regulatory requirements. We support our leadership talent pipeline in stretch roles, including supporting them in stepping up to cover vacant roles in high profile areas.

### Managing change

To meet the changing needs of Nationwide and our customers, there will be times when we need to change the way we work or how we are structured, in support of achieving our longer-term strategic ambitions.

We consult with our colleagues and with our unions (the Nationwide Group Staff Union (NGSU), and Unite the Union) in a transparent way, early in any change process. We remain committed to effective change management, equipping our leaders with the tools, resources, and guidance they need to undertake people change in an effective, caring and consistent way. Our change toolkit supports and empowers our people leaders, and we have measures in place to ensure diversity, inclusion and wellbeing remain a core part of our approach and decision-making.

Our people change approach ensures our colleagues are treated with kindness, fairness and respect, and are positively engaged. We track sentiment and feedback across the Group so we can continue to improve our future change approach, to deliver the best outcomes for our colleagues.

### Engaging with colleague representatives

We recognise the importance of staff representation and believe having access to, and being represented by, a trade union is an important aspect of employee voice.

Nationwide and Virgin Money sub-groups have collective bargaining arrangements in place with the NGSU and Unite the Union respectively. For both sub-groups, 99% of our employees have the right for representation.

Although memberships with the Unions are not a condition of employment, we encourage colleagues to support the activities of the Unions by becoming members. At our Nationwide sub-group, around 60% of permanent colleagues belong to the NGSU.

Our recognition agreements with the NGSU and Unite the Union respectively, document our commitment to working in partnership. Both Unions have negotiation rights over various matters, and we consult with them and provide information on colleague feedback, equal pay, and inclusion and diversity data. We also proactively engage with the Unions on remuneration packages and on changes to our employment policies, to ensure our colleagues are represented and treated fairly. More information can be found in our Nationwide sub-group Freedom of Association Policy Statement<sup>92</sup>.

<sup>92</sup>[Freedom of association policy statement | Nationwide](#)

# Engaging our suppliers

As a Group, we work with around 1,600 suppliers, who help us run and improve our business and deliver quality service to our customers. This section details our approach to building environmental and social considerations into the key stages of our supplier relationships, from onboarding and contracting, to ongoing monitoring of ESG performance.

## Our Third Party Code of Practice

It is important to us that our suppliers reflect our values and ambitions. Nationwide and Virgin Money operate their own Third Party Code of Practice ([Nationwide Third Party Code of Practice](#) and [Virgin Money Supplier Code of Conduct](#)). We continue to find opportunities to integrate practices across the Group.

Our Third Party Codes outline the environmental and social standards we expect our suppliers to uphold, beyond applicable legal requirements. This includes expectations relating to ethical working practices and environmental management. During our onboarding process, new suppliers are requested to confirm compliance with the Codes. Within the Nationwide sub-group, we tier expectations based on the size of the third-party organisation.

This year, we enhanced our Third Party Codes, for example, by increasing expectations around environmental commitments. In the Nationwide sub-group, we extended emissions reporting and target expectations for large third parties to also cover scope 3 emissions, and requested environmental claims controls to prevent greenwashing. In our Virgin Money sub-group, we increased expectations for suppliers to have their own environmental policy, key performance indicators, and to meet commitments outlined in Virgin Money's Environmental Policy.

We also increased expectations regarding our third parties' supply chains. For example, in the Nationwide

sub-group, we included expectations that large third parties flow ESG expectations down their own supply chains, and in our Virgin Money sub-group, we increased expectations that suppliers maintain as local a supply chain as possible.

In addition, our Nationwide sub-group conducts evidence-based controls testing on a prioritised set of third parties to check compliance with the Third Party Code of Practice, and to request action where gaps are identified. Factors such as the criticality of service and ESG risk are considered in the selection of third parties tested. Where gaps are identified, action is requested, and outcomes are tracked.

## Nationwide's Procurement for Mutual Good Programme

We launched our Procurement for Mutual Good programme in 2020, with the ambition to drive best practice in sustainable procurement. This has enabled us to embed environmental and social considerations into our procurement policies and processes in five areas of focus:

- Climate action
- Modern slavery
- Prompt payment
- Social enterprise
- Supply chain diversity

## Climate action – progress towards our scope 3 upstream (categories 1,2 and 4) emissions

We have calculated our scope 3 emissions for upstream activities related to purchased goods and services (category 1), capital goods (category 2) and upstream transportation and distribution (category 4), which account for around 89% of our total Group emissions across scope 3 categories 1-8. More information can be found on page 26 of our Climate-related Financial Disclosures 2025.

In 2024, we established proportionate science-based target expectations for certain contracts<sup>93</sup>. By the end of 2024, suppliers representing around 60%<sup>94</sup> of our spend had either set or committed to setting targets. Our Nationwide brand was recognised for our ambitions and activities to reduce the emissions associated with our supply chain, receiving the 2024 Best Commitment to Carbon Reduction in Supply Chains Award at the Chartered Institute of Procurement and Supply (CIPS) Excellence Awards.

In 2024, we hosted a Third Party Talk on climate change – a virtual one-day conference open to all Nationwide-managed suppliers. The aim of the event was to share our climate change strategy and science-based targets expectations, as well as insight from across our supply chain, with sessions led by some of our key suppliers on related topics, such as cloud computing, guidance available to small and medium enterprises, and transition planning.

<sup>93</sup>Those with a minimum spend of £3 million and minimum contract tenure of 12 months.

<sup>94</sup>This figure is inclusive of Virgin Money suppliers.

## Modern Slavery

We continue to take steps to understand better, and mitigate the risk of, modern slavery within our supply chain. Our standard agreements with third-party suppliers include provisions for ethical trading, compliance with our Third Party Codes, and steps to monitor their own operations and supplier networks for modern slavery.

This year, we expanded our risk assessment across the Group to understand key modern slavery risks across the collective supply chain. At our Nationwide sub-group, we conduct enhanced monitoring within certain higher risk areas of our supply chain, for example, through annual EcoVadis assessment or Sedex Members Ethical Trade Audits (SMETA).

In addition, we refreshed our Nationwide training on responsible purchasing and supplier management training to include more on modern slavery, including high risk sectors, signs of modern slavery, and reporting suspicions. We ran a supplier voice survey for Nationwide suppliers, to understand their experience of working with us and to inform opportunities to enhance our responsible purchasing practices. We reviewed 50 of our key contracts for their commitments to the UK real Living Wage<sup>95</sup>. More information can be found in our Modern Slavery Act Statement.

## Prompt payment

Paying our suppliers promptly supports their cashflow and ensures they can, in turn, pay their workers on time.

At our Nationwide sub-group, our standard contractual payment terms are 45 days for businesses with more than 50 employees, and we endeavour to pay businesses with less than 50 employees in 10 days. At Virgin Money, our standard contractual payment terms are 30 days for all businesses.

Our Nationwide sub-group was previously a signatory to the Prompt Payment Code, a voluntary code for timely payment of invoices, which was retired in December 2024. We are currently reviewing the new Fair Payment Code which replaced it. For the period April 2024 to March 2025, within our Nationwide sub-group, 97% of invoices were paid within 60 days, 95% were paid within their contractual terms, and 96% of invoices were paid to small and medium enterprises within 30 calendar days<sup>96</sup>.

## Social enterprise

As a mutual founded on a social purpose, we want to support other organisations founded with a social mission too. In 2018, we became members of the Buy Social Corporate Challenge<sup>97</sup>, a group of businesses committed to collectively spending £1 billion with social enterprises between 2016 and 2026. Working with social enterprises enables us to get the goods and services we need, while making a positive social impact. In 2024, within our Nationwide sub-group, we spent around £230,000 directly with 14 social enterprises, including, for the first time, Diversity-Talent CIC, E Squared Enterprise and Employability, and Signly.

Across our Nationwide sub-group admin sites, around £385,000 was spent on food and drink items with social enterprises (including Belu, Change Please, Ethstat, NEMI teas and Social Supermarket), through colleague purchases and Nationwide subsidies.

## Supply chain diversity

In 2022, we joined the Minority Supplier Development Network (MSDUK), the UK's leading supplier diversity advocacy organisation, helping companies such as Nationwide to build a more diverse and inclusive supply chain. In 2024, Nationwide procured services from around 20 organisations who identified as ethnic minority, disability, LGBTQ+, or women-owned.

## Responsible sourcing

We request that prospective suppliers agree to comply with our Third Party Codes, which outline our ESG expectations for third party suppliers (see page 43). Negative responses are reviewed by our ESG teams within Procurement, which may include clarification with the supplier. Gaps in our expectations may result in negotiation of corrective action, or onward escalation to determine whether there are grounds to proceed with the onboarding.

Within our Nationwide sub-group, we apply a 10% minimum weighting for sustainability in our supplier tendering process. This ensures we place prominence on sustainability matters at the point of supplier selection. We have a template set of sustainability questions and an evolving list of service-specific questions. They cover topics such as EcoVadis performance, science-based targets, renewable energy use, real Living Wages, Disability Confident employer status, diverse ownership, and social enterprise status.

In 2024, Nationwide introduced science-based target expectations for certain contracts into our Third Party Code, which forms part of the contract approval process.

<sup>95</sup>The review included Nationwide sub-group contracts only, and found that 80% confirmed an existing alignment to UK real Living Wage provisions. We are building this commitment into contracts with priority services at our Nationwide sub-group.

<sup>96</sup>These figures relate to the Nationwide sub-group only.

<sup>97</sup>[Buy Social Corporate Challenge](#) | [Social Enterprise UK](#)

## Responsible supplier management

We continually monitor and manage third-party supplier sustainability performance.

Our Nationwide sub-group works with EcoVadis, an international sustainability ratings provider, to help us monitor third-party supplier sustainability performance. At Virgin Money, supplier performance was tracked through the CDP Supplier Engagement Programme. We plan to step away from the CDP Supplier Engagement Programme and identify which Virgin Money suppliers we will onboard onto the EcoVadis platform, as we look to manage our supplier performance as a Group.

Over the year, we conducted a review within our Nationwide sub-group to prioritise which third parties were invited to undertake an EcoVadis rating assessment, focusing on strategic relationships, material services, and those presenting the greatest ESG risk or opportunity. By the end of 2024, we had prioritised 130 third parties for participation in EcoVadis, of which 73% of these had valid scorecards, representing 59% of procurement spend.

Over 2024, the average EcoVadis score across Nationwide sub-group's suppliers was 66% (2023/24: 63%). This is 18%pts higher than the average score across the entire EcoVadis network of 48%.

At Virgin Money, supplier performance was tracked through the CDP Supplier Engagement Programme to understand their progress in reducing their emissions. In 2024, we had a response rate of 72%, which compared to an industry average of 35%.

Our Nationwide sub-group also completed the EcoVadis assessment. Our overall score in 2025 increased to 72% (2024: 66%). We maintained our Silver EcoVadis medal, and our score put us in the 92nd percentile of over 130,000 companies that EcoVadis has rated worldwide. Over the coming year, we plan to complete the EcoVadis assessment on a Group basis.

## Colleague training on responsible purchasing

Colleagues involved in outsourcing and third-party relationship management play a key role in responsible supply chain practices, such as seeking opportunities to reuse, repair and rent, considering social enterprises and diverse-owned suppliers, the importance of prompt payment, sharing accurate forecasts of supply required, avoiding last minute changes to orders, and encouraging two-way feedback.

Responsible Purchasing Principles and training are made available within our Nationwide sub-group for our procurement colleagues and those engaged in supplier management. As at March 2025, 89% of Nationwide's Procurement team had completed this training. We are exploring how to make this training available across the Group.

At Virgin Money, we introduced ArcBlue, a procurement specific training platform where procurement colleagues were individually assigned tailored training plans according to their role and outcomes of a training-needs evaluation. Sustainable Purchasing is offered as a module within this platform.

We will continue to align our approach as a Group and improve how we embed environmental and social considerations into our procurement and supply chain processes.

We are developing toolkits to provide additional guidance to our suppliers on climate change and modern slavery, following feedback from them that they would benefit from additional support. We are playing an active role in the new Financial Initiative on Sustainable Procurement (FISP), a cross-industry peer group, to discuss best practices and common challenges concerning sustainable procurement and supply in the financial industry.

More on our engagement with our supply chain can be found on page 22 of our Annual Report and Accounts 2025.

# Governance

## How we govern ESG-related risks and opportunities

Our ESG governance model provides clear oversight and management of sustainability-related risks and opportunities. Our Group governance model, as outlined below, supports us in delivering our purpose of Banking – but fairer, more rewarding, and for the good of society. More information on our Group governance framework can be found on pages 63 to 69 and on page 125 of our Annual Report and Accounts 2025. More information on our climate-related governance model can be found on pages 16 to 17 of our Climate-related Financial Disclosures 2025.

### The Board

The Board is responsible for setting the Groups' strategic direction, including our responsible business strategy and climate-related components. It also has ultimate accountability for all climate change risk-related matters within the Group.

The Board is supported by formal governance committees, working groups, and the Virgin Money Board (that is responsible for overseeing the delivery of its contribution to our strategy, including responsible business strategy and climate change).

Over 2024/25, our Board engaged on responsible business-related matters, including:

- Overseeing the completion of Nationwide's acquisition of Virgin Money, including considering the benefits of the acquisition for members and future members at every stage.
- Debating and considering the opportunities and challenges facing the Group due to the changing macro environment, and agreeing the propositional, financial, strategic and risk response.
- Approving our new Nationwide Fairer Futures social impact strategy and key charitable partnerships, and receiving updates on progress.
- Receiving quarterly updates on progress made towards Mutual Good Commitment targets (see pages 59 to 64) and broader ESG activity.
- Approving the Nationwide Fairer Share Payment to 3.85 million eligible members and the payment of the Big Nationwide Thank You to over 12 million eligible members.
- Endorsing the extension of Nationwide's Branch Promise to include Virgin Money branches.
- Receiving regular updates on culture and colleague sentiment, as well as on inclusion and diversity measures.
- Receiving regular updates on customer satisfaction and on customer complaints, their themes and mitigation.
- Approving our Nationwide sub-group Modern Slavery Act Statement 2024.

More information on the Board's engagement with stakeholders, and on its decision-making, can be found on pages 19 to 29 of our Annual Report and Accounts 2025.

**Board-level committees**

Our Board is supported by committees that provide oversight and advice on a range of matters, including sustainability-related matters, as described on pages 69 and 125 of our Annual Report and Accounts 2025. For 2024/25, these sustainability-related matters included:

- Approving Nationwide's Gender and Ethnicity Pay Gap reporting for 2024.
- Reviewing, and endorsing, our Climate-related Financial Disclosures 2025.
- Reviewing the appropriateness of our intermediate (by 2030) science-based target for mortgages, including our internal modelling of estimated policy impacts on emissions reductions, and approving alignment of targets across the Group, where feasible.
- Tracking progress against the directors' long-term incentive arrangement, which is linked to a scorecard that includes ESG measures. As part of the remuneration of our most senior leaders, an individual's contribution is considered, including their impact on diversity-related measures and climate-related activities where relevant.
- Overseeing the embedding of the FCA's Consumer Duty requirements to ensure good customer outcomes continued to be delivered.
- Receiving regular reports on economic crime and fraud-related risks.

**Group Chief Executive Officer (CEO)**

Our Group CEO is accountable to the Board for the Group's performance and delivery of the Group's strategy. The Group CEO, assisted by her team of direct reports, including the CEO of Virgin Money, is responsible for the day-to-day operation and management of the Group, under delegated authority from the Board.

To help our Group CEO deliver on these responsibilities, several executive management-level, and operational-level, committees are in place to ensure sustainability-related matters are managed effectively.

**Executive management-level committees**

Our executive management-level committees meet regularly and discuss and approve, where required, sustainability-related matters, and report to the Board and Board level committees as required. In 2024/25, they:

- Reviewed progress towards our Mutual Good Commitments.
- Provided input into our new Mutual Good Commitment targets for 2025/26.
- Discussed our investors' ongoing interest regarding ESG matters, including our ESG ratings.
- Discussed updates on climate-related matters.
- Discussed updates on inclusion and diversity-related matters.
- Endorsed the Social Impact Report 2024, ahead of its publication.
- Endorsed the Principle for Responsible Banking report 2024 and ESG Disclosures 2024, ahead of approval by the Chief Financial Officer and subsequent publication.

More on the climate-related matters that our executive management-level committees engaged on can be found on page 17 of our Climate-related Disclosures 2025.

We also have a number of operational-level committees and working groups that frequently engage on (at least quarterly) and approve, where required, responsible business and climate-related matters. Matters are reported to the executive management-level committees as required. These include, among others, customer vulnerability working groups, and climate change risk committee.

Our climate change and responsible business capability is managed through our Finance function, who take a co-ordinated approach, working closely with other specialist teams across the business to deliver our responsible business strategy. These specialist teams include: Customer Propositions, Mortgages and Financial Wellbeing, Retail Products, Retail Services, People Strategy, Social Impact, Business Services, Treasury Sustainability and Investor Relations, Policy and Public Affairs, Second Line Risk Oversight, and Audit. These teams provide the relevant information around responsible business-related risks and opportunities to the executive-level committees and operational working groups.

### Board experience

Our Board of Directors have a wealth of experience between them to drive forward our strategic ambitions, including our climate change and responsible business ambitions.

To ensure that an appropriate balance of skills, experience and knowledge on the Board is maintained, the competencies of individual Board members are regularly reviewed. More information can be found on page 74 of our Annual Report and Accounts 2025. A balanced Board is vital for constructive and open debate in the boardroom and, ultimately, effective Board decisions.

In 2024/25, those on the Board with particular expertise around ESG initiatives were:

- Kevin Parry (Chairman since February 2022, previously Board Director)
- Tamara Rajah (Independent non-executive director since September 2020)
- Debbie Klein (Independent non-executive director since March 2021)
- Sally Orton (Independent non-executive director since June 2023)
- Alan Keir (Independent non-executive director since March 2022)
- Gillian Riley (Independent non-executive director since April 2022)
- Anand Aithal (Independent non-executive director since October 2024)

More detail on individual director biographies, including their relevant skills and experience, can be found on pages 58 to 62 of our Annual Report and Accounts 2025.

### Promoting a culture of sustainable banking through remuneration

Following the acquisition of Virgin Money, there have been no immediate changes to the broad approach to remuneration of colleagues within the Group, in order to provide a level of consistency and stability for all colleagues.

Employees within our Nationwide sub-group continued to participate in the Annual Performance Pay (APP) plan during 2024/25. This plan is based on a combination of the collective achievement of Nationwide's shared goals and individual contribution. Individual contributions are measured by performance in relation to both delivery and behaviours. This reflects our success in achieving measures that focus on delivering benefits for the mutual good of our customers, ensuring we drive the right

culture and behaviours. A similar construct applies for Virgin Money colleagues, ensuring consistency across the Group.

During 2024/25, the Remuneration Committee reviewed the director's remuneration policy in the context of the significantly increased size and scope of the Group. The increased scale of Nationwide brings additional complexity and demands of executive roles. As such, the Committee updated the policy to increase the maximum APP opportunity that may be awarded to directors from 100% to 150% of salary. The Committee believes that an increase to performance-based pay opportunity is appropriate as it will enhance the alignment between reward and the successful delivery of the Group's priorities.

In addition, our most senior population is invited to participate in the Long-Term Performance Pay (LTPP) plan. The performance measures within the LTPP awards are aligned to the Group's longer-term priorities and provide a clear link with customers' interests and the achievement of our financial and strategic aims, including environmental and social commitments. ESG objectives within the LTPP awards are aligned with the Group's scope 1 and 2 carbon emissions targets, and with diversity targets around gender and ethnicity at senior levels.

More information on remuneration for 2024/25, including the structure of the LTPP awards, can be found on pages 92 to 117 of our Annual Report and Accounts 2025.

## Tax payments and responsibilities

Our size and scale mean we play a central role in the UK economy. Our mutual status and values mean we consider the taxes paid and collected on our business operations as an important part of the economic and social contribution we make to the wider society we serve. This governs our approach to, and interactions with, tax authorities. As a result, the Group strives to pay the right amount of tax at the right time, in accordance with legal requirements, our obligations under the Code of Practice on Taxation for Banks, and consistent with our strong commitment to social responsibility.

The Group has a low appetite for tax risk and seeks to comply with all applicable regulations. Tax risks are managed through our Enterprise Risk Management Framework (ERMF) which sets out minimum standards and processes for risk management. Nationwide and Virgin Money operate independent, but aligned, ERMFs. The management of tax risks within the respective ERMFs are supported by each sub-group's Taxation Strategies and internal Tax Policies.

The Group does not tolerate activities which facilitate tax evasion, and we are committed to preventing the facilitation of tax evasion by individuals or businesses associated with our operations. We mitigate these risks by completing initial and ongoing due diligence, risk assessment and screening of our employees, customers, third parties and associated persons. We also assess the risks of tax evasion in any joint venture, mergers and/or acquisitions.

We promote a culture of compliance throughout the Group, and our employees are made aware of their anti-tax evasion obligations through mandatory annual online training. This includes how to report any suspicions of tax evasion, and the availability of our whistleblowing channels.

More information on whistleblowing can be found on page 53.

More information can be found in our taxation strategies ([Taxation strategy](#) | [Nationwide](#) and [Tax transparency](#) | [Corporate governance](#) | [About us](#) | [Virgin Money PLC](#)).

# Risk management

Effective risk management is essential to the Group's ongoing strength and the delivery of our strategic objectives. As such, we adopt a prudent approach to risk management, keeping our customers' money safe and secure. We do this by embedding a culture of responsible behaviour across the Group, and ensuring that the risks we take in support of our strategy are controlled through a robust risk framework.

## Embedding a responsible behaviour culture across the Group

Our aim is to act responsibly, doing business in a way that positively impacts our customers, employees, and communities, while seeking to reduce our impact on the environment. Our Codes of Conduct, Customer First Behaviours, and policies and practices, guide how we work, and are supported by colleague training and our remuneration practices. For information on our remuneration practices, see page 48.

### Code of Conduct

Both Nationwide and Virgin Money operate respective Codes of Conduct, that ensure, as a Group, we operate ethically and with integrity. The Codes guide colleagues on the standards of conduct and behaviour we expect from them, so that we can deliver positive and meaningful outcomes for our customers and communities. We will look to create a Group Code of Conduct in the future, as appropriate.

Our Codes of Conduct are supported by a suite of policies and standards, as described in this chapter. We also have a suite of policies for our third-party suppliers across Nationwide and Virgin Money, that promote the values and behaviours expected of our supply chain.

## Customer First Behaviours

Following our acquisition of Virgin Money, we developed a Group purpose, strategy and set of behaviours that Nationwide and Virgin Money can unite behind, putting customers at the heart of everything we do. We engaged our senior leaders and all colleagues through a series of immersive events, to build clarity, connection and commitment to our future direction and shared ambition as a combined Group.

We have four Customer First Behaviours, that put customers and members at the heart of how we work together. They are:

- **Feel what customers feel** – We step into our customers' shoes, using their feedback and insights to empathise with them and to understand their needs, so that every decision we make starts and finishes with our customers in mind.
- **Say it straight** – We are brave in speaking out and saying what we think – we are honest and direct with good intent, openly sharing diverse perspectives to reach the best conclusions and using language everyone can understand.
- **Push for better** – We do not settle for mediocrity; we challenge the status quo, taking responsibility for continuous improvement and personal development.
- **Get it done** – We prioritise what will have the greatest impact, we are decisive, and we take accountability for delivering brilliant customer outcomes.

Our Customer First Behaviours are an integral part of our performance framework, as described on pages 40 to 41.

## Group Enterprise Risk Management

Following the acquisition of Virgin Money on 1 October 2024, the Group operates independent but aligned Enterprise Risk Management Frameworks (ERMFs) to ensure risks are managed in a consistent and rigorous way. These frameworks define how risks are managed within each business and set out the risk management responsibilities of all colleagues within an industry-standard three lines of defence model. They also ensure that all risks are appropriately and consistently identified, assessed, managed, monitored, and reported. These frameworks are supplemented by Group-level governance, which supports the Board in ensuring risks are managed consistently and rigorously across the Group, with appropriate escalation routes in place. Each ERMF is supported by a system of internal controls and processes.

The Board approves the Group's risk appetite, defining the acceptable levels of risk to take in pursuit of the Group's strategic objectives. To support this, the Nationwide and Virgin Money sub-groups also approve risk appetite for the specific risks arising from their operations through their respective governance structures. The frameworks are underpinned by processes, policies and standards that are specific to the types of risk faced by each sub-group.

The Board receives regular reports and assessments of the Group's risk management, including key risk metrics, to monitor our position relative to risk appetite. The design and operational effectiveness of the Group's approach to risk management and internal controls is regularly reviewed and enhanced in response to changes in the internal and external risk profile, allowing tailored responses to be developed where improvements are considered appropriate.

Our ERMFs follow similar principles based on five core elements: risk appetite, policies and controls, risk management, risk reporting, and enablers and governance. These align to the practices of our industry peers, and connect risk management across our business. In combination, these components ensure the risks to which we are exposed are adequately identified, assessed, managed and mitigated, including those related to social risk.

Over the course of 2025 and 2026, the existing frameworks will be integrated to provide one common way of managing risk across the Group. This will be supported by a common suite of risk policies, which will be designed and maintained to keep the Group within risk appetite, with underlying risk processes and systems following suit as integration activity progresses.

Further information on our approach to risk management can be found on pages 123 to 126 of our Annual Report and Accounts 2025.

### Responsible business-related risk management

Our governance structure for managing environmental and social risks, including the oversight of our progress towards the achievement of our Mutual Good Commitments, is described on pages 46 to 48 of this report.

Our Responsible Business Committee (RBC) oversees Nationwide's responsible business approach and its implementation, which covers both our social and environmental ambitions. RBC also has responsibility for

taking and co-ordinating any remedial action needed to support us in achieving our Mutual Good Commitment targets. For more information, see page 47.

In addition, in line with the United Nations Guiding Principles (UNGPs), our Nationwide sub-group reports on salient human rights risks. More information on our approach to managing human rights risks can be found on page 57.

### Managing environmental risks

We continue to enhance our management of climate-related risks across the Group. Through our ERMFs, we aim to identify, assess and manage climate-related risks. Currently, Nationwide considers climate change as a cause to our principal risks, and Virgin Money considers climate change as a principal risk. We will align our approach, across the Group, in the future.

This year, we started to consider nature-related risk alongside climate change as a cause to Nationwide's principal risks. This enables us to better assess potential climate and nature-related impacts, whilst considering possible future reporting frameworks, such as the Taskforce on Nature-related Financial Disclosures (TNFD). More information can be found on pages 10 to 13 of our Climate-related Financial Disclosures 2025.

### Managing social risks

Our identification, assessment and management of social risks is inherent within our independent, but aligned, ERMFs. Social risks may most notably manifest within a certain subset of risks, including business risk, credit risk and operational and conduct risk.

**Business risk** – Business risk is actively managed to ensure the Group generates sustainable returns by focusing on recurrent sources of income that provide value commensurate with risk appetite, and meets the needs of current and future customers. Business risks are managed and mitigated through a range of

measures, including financial forecasting processes, regular performance monitoring, and stress testing and sensitivity analysis. Ongoing monitoring ensures that our strategy and associated execution plans adapt to address business risks by considering changes in the external environment, including technology innovation, consumer behaviour, regulation and market conditions. Delivery of the Group's key strategic initiatives and maintaining attractive customer propositions continues to be an important mitigant to business risks. More on our management of business risk can be found on page 199 of our Annual Report and Accounts 2025.

**Credit risk** – The Group operates with a commitment to lending in a responsible, affordable and sustainable way, with a focus on championing good conduct and outcomes. This ensures safeguarding of customers and the financial strength of the Group through the credit cycle. The Group has appropriate credit criteria and policies aimed at mitigating risk, and ensuring we only lend to customers who demonstrate that they can afford to borrow. More on our management of credit risk can be found on pages 127 to 170 of our Annual Report and Accounts 2025.

**Operational and conduct risk** – It is critical that we remain safe and secure and do the right thing for our customers, with a risk and control culture embedded across the Group. We manage operational and conduct risks through proportionate controls designed to identify and prevent failures that could affect customers, colleagues or the Group. The Board recognises the importance of, and has prioritised, continuous improvement in understanding the operational and conduct risks the Group is exposed to, and enhancement of the associated control environment it relies on to mitigate these risks. Additional investment has been allocated to enhance cyber defences, and economic crime, conduct and compliance capabilities across the Group. The primary areas of operational and conduct risk to which the Group is exposed include operational

resilience and technology, cyber security, artificial intelligence (AI), data protection, supply chain, regulatory compliance risk, conduct risk and economic crime risk. More on our management of operational and conduct risks can be found on pages 200 to 202 of our Annual Report and Accounts 2025.

### Policies and practices

Both Nationwide and Virgin Money operate an independent suite of controls, policies and practices that support a culture of responsible behaviour among colleagues and ensure legal and regulatory requirements are met. We will look to align our approach as a Group in the future, as appropriate.

Our policies ensure risk is managed in a responsible and sustainable way. They set out how we work, and the standards we hold ourselves to, as well as the responsibilities of our employees and our temporary workers and contractors where appropriate. We have separate supplier code of conducts which promote the values and behaviours expected of our supply chain.

Policies are subject to periodic review and are each overseen by a policy owner. Our policies reinforce the importance we place on good conduct and on each person's accountability for maintaining it.

Our policies include (among others):

- Code of Conduct
- Health and safety
- Speaking up and whistleblowing
- Economic crime (including anti-money laundering, corruption, anti-bribery and sanctions)
- Security (including cyber security)
- Data privacy
- Conflicts of interest
- Political involvement
- Responsible marketing
- Responsible investment

These policies are summarised over the following pages. Our policies around discrimination, freedom of association, and taxation can be found on pages 38, 42 and 49 respectively. Nationwide's broader range of policies and statements can be found on our [Nationwide](#) and [Virgin Money](#) websites.

### Training our colleagues

Our suite of training courses across the Group plays an important role in embedding a culture of responsible behaviour among colleagues.

All colleagues must complete a series of annual, mandatory learning modules across several topics including anti-bribery and corruption; market abuse; conflicts of interest; Consumer Duty and vulnerable customers; data protection; information, physical and cyber security; economic crime (including modern slavery and human trafficking); sanctions; health and safety; and speaking up and whistleblowing. Completion rates are tracked and linked to annual performance ratings.

Colleagues in regulated advice roles, such as our mortgage advisers, are equipped with role-specific qualifications and receive regular updates in training, and are subject to quality checks.

We encourage colleagues to engage with ESG issues and make sustainable choices, and we offer internal training on ESG and climate change. Our Nationwide branch colleagues have access to an ESG information sheet, which is designed to support them with their understanding of sustainability across the Group. Our procurement colleagues, as well as colleagues engaged in procurement activities, are also encouraged to complete training on topics such as responsible purchasing and supply chain decarbonisation. More information on training for procurement colleagues can be found on page 45.

### Health and Safety

We are committed to providing a positive and proactive working environment that fully supports the health, wellbeing and safety of our colleagues, customers and third parties alike. Investing in health and safety and providing good welfare facilities helps to prevent injuries, accidents and illness.

The financial services sector is traditionally seen as a low-risk industry for health and safety-related issues. However, we recognise accidents, ill health, and incidents can occur and we have appropriate management controls in place to mitigate risks and investigate any occurrences.

Nationwide and Virgin Money sub-groups operate independent sets of policies and practices to promote safe and healthy ways of working. Policies are developed in partnership with our Unions.

Our respective health and safety policy statements apply to all employees, including temporary workers and contractors. This is supported by a suite of policies and procedures that manage specific risks. All employees are required to complete mandatory online training on health and safety and fire safety.

Over the year, we focused our efforts on themes including responding effectively to verbal and aggressive behaviour towards frontline colleagues, managing mental health in the context of increasing work-related and non-related work stress, and supporting colleagues through periods of change through robust action plans.

Our risk management arrangements support us in assessing risks and taking appropriate corrective action to manage hazards, and we seek to reduce the number of accidents and absenteeism due to ill health. We ask colleagues to complete risk assessments based on their working environments. These assessments reflect common hazards associated with office and hybrid working. We review accident and incident trends to understand the root cause and take appropriate action to support reducing accidents. We have guidelines in place

to prepare for, and respond to, emergency situations. For example, in accordance with our Gold, Silver and Bronze structure for Incident and Crisis management, we have a Pandemic Playbook and Employee Welfare Plan at our Nationwide sub-group.

We conduct audits across all our locations. At our Nationwide sub-group, external consultants provide health and safety assurance across our admin sites and branches every five years, and also undertake an audit of our health and safety framework every five years, under the managing for health and safety (HSG65) standards and the Health and Safety Executive's recommended Plan, Do, Check, Act approach. At Virgin Money, all locations are audited internally on a rolling three-year basis, based on the Health and Safety Management Standards<sup>98</sup>.

We provide a wide range of workplace adjustments where required, to support a diverse workforce. These are available to support both physical and non-physical conditions. Guidance and support materials are made available to people managers, including on tailored working plans and personal emergency plans. We also provide colleagues with access to external specialists who can provide advice and guidance on suitable workplace adjustments.

We use a number of tools to support our understanding of work-related stress, including colleague sentiment surveys and workplace stress risk assessments. We offer training to managers on managing mental health, which covers the signs of mental health and accessing support services. We recommend that colleagues are referred to specialist services for mental health support, and colleagues can also use our 24/7 employee assistance helplines. We work closely with our occupational health providers to find solutions to further improve colleague attendance and support those with a disability or long-term condition, to reduce specific difficulties in the workplace.

We also maintain a broader focus on supporting our colleagues' overall wellbeing, as described on page 39. In addition, our hybrid working arrangements support colleague wellbeing.

Some of the ways we measure our success in health and safety performance is through, for example, the number of accidents/incidents (including Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)), compliance with health and safety audits, sickness or absence as a result of psychological or physical injury at work, and the number of enforcement notices.

In 2024/25, our Nationwide sub-group reported three RIDDOR incidents (2023/2024: three). At Virgin Money, there was one reported RIDDOR incident. Over the year, fire risk assessments were conducted, and our operational sites across the Group underwent a health and safety risk assessment.

More information can be found in Nationwide's [Health and Safety Policy Statement](#) and Virgin Money's [Health and Safety Statement](#).

### Speaking up and whistleblowing

We support, promote, and encourage our colleagues to speak up whenever they witness or experience actual or potential misconduct, wrongdoing or unacceptable behaviour, and we want them to feel confident to do so without fear of retaliation. We have arrangements in place for all employees, contractors and temporary workers across the Group to raise concerns confidentially or anonymously (if preferred) via various channels, including online portals hosted by independent third parties. All employees are required to complete annual, mandatory speaking up and whistleblowing training.

All concerns raised are investigated thoroughly, fairly, and in accordance with our whistleblowing investigation

guidelines. If we find evidence of wrongdoing, we consider further action, in accordance with Human Resources policies and processes. We do not tolerate instances where individuals are treated differently as a result of raising their concerns, and we treat any act of retaliation as a disciplinary matter.

The Board recognises that having effective and trusted confidential whistleblowing arrangements is key in supporting the Group's open and honest culture. The Board has appointed the Chair of its Audit Committee, Phil Rivett, and the Virgin Money Board has appointed the Chair of its Audit Committee, Tim Wade, as their respective Whistleblower Champions. The Whistleblower Champions are responsible for ensuring and overseeing the integrity, independence and effectiveness of the respective policies and procedures relating to whistleblowing. This includes measures to protect whistleblowers from being victimised for raising reportable concerns.

Our colleague culture survey showed that 87% of colleagues at our Nationwide sub-group would be happy to speak up if they witnessed or experienced any unacceptable behaviour<sup>99</sup>. Our score was 13%pts higher than the financial services benchmark and 7%pts higher than the high performing benchmark. At Virgin Money, 81% of colleagues felt it was safe to speak up<sup>100</sup>.

The Board receives an annual whistleblowing report and reviews the adequacy and effectiveness of its whistleblowing arrangements. Due to the developing nature of Nationwide's and Virgin Money's integration, this year's report as at 31 December 2024 was presented to the Board on a Nationwide sub-group basis only. During the 12 months to 31 December 2024, a total of 251 (2023: 232) concerns were raised within the Nationwide sub-group, of which 96 (2023: 78) were formally investigated as whistleblowing. The remainder were investigated utilising other internal channels. Of

<sup>98</sup>The [Health and Safety Management Standards](#) is a framework developed by the UK Health and Safety Executive to help employers manage the risks associated with work-related stress.

<sup>99</sup>Our colleagues' score at Nationwide sub-group reflects the results of its 2024 Culture survey, which was conducted between 23 September and 13 October 2024.

<sup>100</sup>Our colleagues' score at Virgin Money sub-group reflects the results of its 2024 MyVoice survey, which was conducted between 10 July and 2 August 2024.

the 96 whistleblowing concerns, 62% reflected people-related concerns (including bullying and harassment, unacceptable behaviours and resourcing). Where cases required further action, they were recommended to the relevant teams, for example, Human Resources, Internal Audit, and/or Fraud.

More information can be found in our [Nationwide Whistleblowing Policy Statement](#), [Nationwide supplier whistleblowing guidance](#), [Virgin Money Whistleblowing Policy Statement](#) and [Virgin Money supplier code of conduct](#).

### Economic crime

Keeping our customers' money safe is a priority, and therefore the prevention of economic crime remains an area of focus. Our Nationwide and Virgin Money sub-groups each operate a separate framework of controls, policies, standards and procedures that apply to their respective subsidiaries, business areas, employees and third parties (including suppliers). These are focused on preventing and minimising economic crime throughout all areas of our business and in our supply chain. Compliance with our policies and procedures is monitored through our three lines of defence model of risk management, risk oversight and audit assurance.

Over the year, we continued to develop our internal threat assessment tools across the Group, including identifying and disseminating emerging threat patterns. Strengthening and maturing our economic crime risk capabilities will remain a focus in the year ahead.

The Group has no tolerance for knowingly facilitating or appearing to facilitate economic crime in any form, including money laundering, terrorist financing, proliferation financing, contravention of sanctions, bribery and corruption, internal or external fraud, or the corporate criminal offences of failure to prevent fraud, facilitation of tax evasion and bribery by any persons acting on behalf of, or providing services for, the Group.

We apply a risk-based approach to deter, detect, prevent and report economic crime. Colleagues are required to follow all procedures to mitigate risks, including the responsibility to report any knowledge or suspicion of financial crime. There are a number of escalation routes for colleagues to raise business ethics concerns and issues, as described in the Speaking up and whistleblowing section above.

Our Nationwide and Virgin Money sub-groups each have a Money Laundering Reporting Officer (MLRO) who has responsibility for oversight of their respective sub-group's compliance with applicable economic crime legislation, regulations, and guidance. Within each sub-group, there is a nominated holder of FCA Prescribed Responsibility D, who has overall responsibility for that sub-group's policies, controls and procedures for countering the risk that each respective sub-group might be used to further economic crime. At Virgin Money, this is jointly held between the MLRO and Chief Operating Officer (COO). At the Nationwide sub-group, the nominated holder is delegated by the Group Chief Risk Officer (CRO) to its MLRO.

Within our three lines of defence model, our Nationwide and Virgin Money sub-groups have independent core governance committees that oversee economic crime risk management, operational performance and transformation matters. Management-level committees within our sub-groups escalate matters to their respective Executive Risk Committees, our Group Risk Committee (GRC) and Board Risk Committee (BRC) as appropriate. The Audit Committee provides oversight and advice to the Nationwide Board on the adequacy and effectiveness of Nationwide's internal controls and risk management systems.

We have allocated clear roles and responsibilities for our colleagues and senior managers (accountable executives) for the management of risk, including clear escalation routes and a range of whistleblowing channels. All colleagues must undertake annual mandatory training in

relation to money laundering, terrorist financing, bribery and corruption (including tax evasion), financial sanctions, fraud, market abuse and insider dealing, conduct risk and whistleblowing.

The Group undertakes annual business-wide risk assessments to identify and assess our inherent economic crime risks. This informs the design and application of proportionate controls to mitigate these risks. We complete initial and ongoing due diligence, risk assessment and screening of our business relationships, including employees, customers, third parties and associated persons. We have systems in place, including transaction monitoring, to detect, investigate and report suspicious activity. We apply enhanced due diligence and increased ongoing monitoring to higher-risk relationships and transactions, in line with our legal and regulatory obligations. We manage our third-party relationships, including our supply chains, to ensure they have the equivalent of, or adhere to, our anti-bribery and corruption, failure to prevent fraud, and anti-tax evasion standards.

We recognise that economic crime cannot be tackled in isolation. We work collaboratively with the Government, regulators, law enforcement, trade bodies, and our industry peers. We are committed to the UK's Public Private Partnerships, where we are a member of the Joint Money Laundering Intelligence Taskforce (JMLIT) and the Joint Fraud Taskforce (JFT). We are a signatory to the UK Government's fraud sector charter, committing to combatting fraud in the sector through a seven-point action plan. We are also actively engaged with the economic crime structures within key industry trade bodies, including UK Finance and the Building Societies Association (BSA).

More information can be found in our [Nationwide Economic Crime Policy Statement](#), [Virgin Money Anti-Bribery and Corruption Policy](#) and [Virgin Money Anti-Money Laundering Policy](#).

## Conflicts of Interest

We are committed to acting with honesty, integrity and transparency in all our business activities. The Conflicts of Interest Policies within the Nationwide and Virgin Money sub-groups set out how we identify, prevent, or appropriately manage actual or potential conflicts of interest. They work alongside other policies, such as gifts and hospitality and anti-bribery and corruption policies.

## Political involvement

Our Group purpose and mutual values underpin our commitment to operate from a position of integrity. We are politically neutral and do not support, or seek to influence public support for, any political party. We engage constructively on issues in the interests of the Group, our customers and our colleagues. We also ensure that the information and insights we provide are up-to-date, complete and not misleading.

We are members of groups which can, and do, carry out political engagement and campaigning. This includes the Building Societies Association (BSA) and UK Finance. More information on our broader engagement with regulators and policymakers can be found on page 21 of our Annual Report and Accounts 2025. More on our influencing and engagement to support positive change in UK housing, and to support our communities, can be found on pages 20 and 30 of this report respectively.

As a Group, we have a set of separate but aligned policies that reinforce the integrity of our political engagement activities. These include our Conflicts of Interest Policies which underpin the need for colleagues to maintain separation between their work and political activity. All colleagues undertaking political engagement activity are expected to adhere to internal policies and standards, including our Codes of Conduct, Anti-Bribery and Corruption Policies, Whistleblowing Policies and Financial Crime Prevention Policies.

More information can be found in our Political Involvement Statements on our [Nationwide](#) and [Virgin Money](#) websites. Nationwide's [public policy prospectus](#) outlines how we seek to work with policymakers to help deliver fairer banking for everyone.

## Operational resilience

Operational resilience is a fundamental part of the Group's strategy. In line with the FCA and PRA regulatory statements on operational resilience, we have made significant advancements in embedding resilience across the Group. We have strengthened our approach through the identification and remediation of potential vulnerabilities and have implemented a comprehensive operational resilience framework.

Beyond operational resilience expectations set by our regulators, we continually invest in our operational resilience capabilities. We have outlined the next phase of our operational resilience strategy, which will be overseen by the Board. Regular updates are provided to the Executive Committees of Nationwide and Virgin Money sub-groups, and to the Board as appropriate. Alongside our efforts internally, we continue to play an active role across the financial services industry to enhance sector-wide operational resilience.

## Cybersecurity

We continuously monitor the external landscape to identify potential cyber and other security threats, whilst operating and maturing our key security controls, including our vulnerability and patch management and privileged access controls, to protect our customers and services. Significant effort is put into cyber risk management capabilities, with ongoing investment in the identification of risk, protection of data, detection and prevention of attacks and continued testing of response and recovery capability should an attack be successful.

Testing of our multi-layered control approach is undertaken on an ongoing basis, including the use of

techniques and procedures practiced by individuals and organisations that attempt attacks. We also regularly test cyber response strategies and security incident management procedures which could be invoked to maintain customer services should an attack be successful. This provides the Group with confidence in its controls and allows a better understanding of how to prevent future attacks, ensuring technical controls are constantly developed, resource is repositioned, and investment is allocated appropriately.

We work closely with the National Protective Security Authority, the National Cyber Security Centre, other government bodies, and peers in financial services and across the industry. This enables us to stay informed about both the potential threats and responses, while sharing best practice in combatting cyber crime.

The accountable executive for cyber security is the Group Chief Security and Resilience Officer, who reports into the Group Chief Operating Officer. A separate Chief Information Security Officer is also dedicated to, and retains accountability for, cyber security at Virgin Money. Regular updates are provided to the Executive Committees of Nationwide and Virgin Money sub-groups, and the Group Management Committee and Board Risk Committee as appropriate.

Our external auditors, Ernst and Young, assess our security controls as part of their annual Group audit.

## Data governance and protection

As a responsible organisation operating in the digital economy, we recognise that robust data governance and protection practices are fundamental to maintaining stakeholder trust and ensuring sustainable business operations.

The Group collects, stores and uses data, including personal information, to deliver services that meet the needs of our customers and to engage with our colleagues. We are committed to protecting the data

under our control and achieving compliance with all legal and regulatory obligations, such as the UK General Data Protection Regulation (GDPR) and the Privacy and Electronic Communication Regulations (PECR).

Our Nationwide sub-group has achieved material compliance with BCBS 239 requirements, and Virgin Money has assessed the work required to move towards compliance. Following its acquisition by the Group, Virgin Money is investing further to mature data governance and align data risk capabilities with those of the Nationwide sub-group.

Nationwide and Virgin Money sub-groups have appointed Data Protection Officers (DPOs). At Nationwide sub-group, the DPO reports into the Group Chief Risk Officer, and at Virgin Money, the DPO reports into the Chief Compliance Officer. The Board Risk Committees review the Annual Data Protection Officer's reports, and the adequacy and effectiveness of our data protection arrangements.

Policies and controls are in place to protect data and manage data risk end-to-end. We assess the risk of all change initiatives and undertake risk assessments, including data protection impact assessments, where required. If data issues are identified, timely and proactive remediation activities are prioritised.

We ensure we respect customers' rights in the processing of data, and that systems and processes are in place to ensure data subject rights can be easily exercised through our core channels. We make customers aware of their information rights, including through our Nationwide and Virgin Money webpages and privacy notices, and we respond to their requests accordingly. Customers are able to update their marketing preferences through a range of channels.

We ensure our colleagues are aware of their responsibilities through a combination of training and awareness activities. All employees are required to

complete annual, mandatory training on data protection and privacy. We regularly distribute privacy awareness communications across the organisation, with a particular focus on our frontline colleagues. Our data protection policies set clear employee expectations, and data breaches are investigated thoroughly in accordance with our disciplinary procedures.

### Artificial intelligence (AI)

The continued, rapid growth of digitisation and demand for enhanced customer experience has led to ever greater volumes of data being used in increasingly complex ways. As a result, the challenges of ensuring that data is used ethically and appropriately, particularly in relation to emerging AI developments, are becoming ever more complex. Responding to these challenges relies upon a rapidly evolving set of skills required to operate and maintain systems and data, whilst ensuring a rigorous focus on customer outcomes.

The Group has a number of safeguards in place to ensure these risks are appropriately identified and managed, including defined principles for Generative AI experimentation, development and control, and only using Generative AI in a limited group of sanctioned applications. The development and implementation of Generative AI technologies follows an enhanced governance process with specialist review, challenge and oversight provided.

The Group continues to review and further strengthen its AI governance as this emerging field matures, and new risk management approaches are identified.

### Responsible products, services and marketing

We are committed to designing, selling and managing products and services in a responsible and sustainable way. We have a set of policies, tools and processes, including an established governance route, for building products and services that are inclusive, meet customers' needs and deliver good outcomes.

We operate policies that guide the design, sale and servicing of our products and services. They ensure we provide responsible products and services to our customers, manage conduct risks, and meet the requirements of the FCA's Consumer Duty requirements.

We consider and make informed decisions about matters such as:

- providing fair value for money for our customers (including pricing our products fairly and ensuring the features and benefits are easy to use for the customers for whom they are intended)
- ensuring our products and services meet the expectations set out in the FCA's guidance on the fair treatment of vulnerable customers. This includes making sure customers with characteristics of vulnerability have been considered, and that any reasonable adjustments have been made to meet their additional needs
- ensuring our terms and conditions are clear, fair and understandable, so our customers can make informed decisions as to whether products and services are right for their needs
- ensuring our products and services do not cause harm to our customers in pursuit of their financial objectives
- whether our products and services address customer feedback and complaints
- ensuring we apply responsible selling practices, so that our products can be distributed safely to customers who need them
- our strategy for providing ongoing services for our products to ensure good outcomes for customers over the entire lifecycle of the product
- other external factors, such as whether we are being responsible and fair, and are actively prohibiting anti-competitive behaviours.

We use a range of feedback methods to inform the development of new products and services. These include

customer panel testing, input from internal groups and engagement with external partnerships. This feedback is complemented by existing customer data, including complaints analysis and post-launch monitoring. We also perform outcomes testing, which gauges the suitability of our products and services for customers to ensure we provide good outcomes.

More generally, doing the right thing for our customers is engrained in our mutual purpose and Customer First Behaviours (see page 50), and reinforced through training and quality check processes. Colleagues in regulated advice roles, such as mortgage advisors, are also equipped with role-specific qualifications. Our performance frameworks (see pages 40 to 41) also reflect our success in achieving measures that focus on delivering benefits for the mutual good of our customers, ensuring we drive the right behaviours.

We operate responsible marketing policies that set out how we share information with our customers, and the steps we need to take for these communications to be understandable, so that customers are able to meet their financial goals. Our controls and processes ensure our customers have all the information they need in a clear, fair, timely, and not misleading manner, to help them make informed decisions on whether the product is suitable for their circumstances and financial needs.

We also have policies that govern the creation and distribution of customer communications, including marketing materials. These policies are supported by robust controls and processes and are designed to ensure compliance with legal and regulatory standards. These include the FCA's Consumer Duty, relevant FCA handbooks and guidance including anti-greenwashing, the General Data Privacy Regulations, Privacy and Electronic Communications, and the Advertising Standards Authority and Committee of Advertising Practice Codes.

We also have controls that ensure that our marketing practices comply with data protection requirements.

More information can be found in our [Nationwide Responsible products and services Policy Statement](#), our [Nationwide Responsible Marketing Policy Statement](#) and our [Virgin Money Responsible Marketing Policy Statement](#).

### Responsible investment

As a building society, our focus is on providing banking products and services for our customers. Our assets are largely formed of residential properties, which includes mortgages and loans to social housing providers. These assets account for more than 85% of our lending portfolio. The remainder of our assets comprise of our business lending portfolio, who are primarily UK-based small or medium enterprises, and our consumer lending portfolio of credit cards and personal loans.

The environmental and social impacts of providing financial services to businesses are mainly indirect. However, we are committed to working with our customers to understand the impacts of the products and services that they offer, as well as their approach to environmental and social sustainability.

We have identified the highest risk sectors across our business lending portfolio and have limited (or eliminated) our exposure to them. As a result, we do not lend to:

- arms that are subject to a treaty or convention, to which the UK government is a signatory (such as nuclear, biological and chemical weapons)
- businesses involved in the exploration, extraction or mining of coal
- businesses that generate revenue directly from oil and gas extraction
- power generation from coal-fired power plants

- non-sustainable, large-scale deforestation activities for alternative land use purposes, including palm oil production.

For more detail on our sector-specific lending restrictions, please see our [Sensitive Sector Statement](#).

We have a treasury investment portfolio, held primarily for day-to-day liquidity management and consistent with applicable regulations. This portfolio is made up of cash and low risk investments, and we do not invest in corporate bonds or equities. Treasury assets represent 15-20% of total assets.

We are committed to holding at least £2 billion of environmental, social and governance (ESG) assets within our treasury portfolios. We define ESG assets as bonds issued by multilateral development banks or green, social or sustainable-labelled bonds. Multilateral development banks provide financial support for economic and social progress in developing countries, and thereby help to advance the UN Sustainable Development Goals (SDGs).

More information on our ESG investment target can be found on page 172 of our Annual Reports and Accounts 2025.

### Managing human rights risks

We are committed to promoting respect for human rights across our Group business operations and value chain, and we seek to have a positive impact on the customers and communities we serve, on the people we employ, and through our supplier and business relationships. Our commitment is embedded in our purpose, our values and Customer First Behaviours (see page 50), and through our policies and frameworks.

Our approach to human rights is aligned with guidance from the United Nations Guiding Principles (UNGPs) Reporting Framework, which advises firms on reporting on human rights, with a focus on reporting their salient human rights risks. Following these guidelines, salient

human rights risks are those that have the potential to cause the greatest harm, as a result of an organisation's activities or business relationships, if action is not taken to prevent or address them.

As a Group, we continue to take action to enhance our approach to respecting human rights throughout our business operations and supply chain.

### Our approach

As a Group, we use research, policies, risk assessments, and other strategies and initiatives to manage human rights risks more broadly. Our Responsible Business Committee provides oversight of sustainability-related matters, including those related to human rights. Nationwide's Human Rights Standard outlines our approach to promoting and supporting human rights.

In 2024, we conducted a saliency assessment, to identify and prioritise the potential saliency of human rights risks. Our assessment was undertaken within our Nationwide sub-group and focused on the risks that presented the greatest potential harm to our customers, colleagues and people in our supply chain. It is our ambition to review our salient human rights risks as a Group in the future.

Our identified human rights risks across our value chain are:

|                     |                                                                                                                                                                                        |
|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Customers</b>    | <ul style="list-style-type: none"> <li>Supporting vulnerable customers</li> <li>Data privacy and security</li> </ul>                                                                   |
| <b>Colleagues</b>   | <ul style="list-style-type: none"> <li>Workplace and non-workplace stress</li> <li>Verbal and aggressive behaviour towards colleagues</li> <li>Discrimination and inclusion</li> </ul> |
| <b>Supply Chain</b> | <ul style="list-style-type: none"> <li>Unfair working conditions</li> <li>Forced labour</li> </ul>                                                                                     |

We have controls, policies and processes within our business to manage issues associated with human rights risks, including for the risks identified above. Information on our approach to supporting customers, colleagues

and our supply chain can be found within this report and in our Modern Slavery Act Statement. We also provide information below on the ways in which we are mitigating these risks.

### Customers

Supporting vulnerable customers – We are committed to supporting all our customers, including those in vulnerable circumstances. We address the needs of vulnerable customers through a Group-wide approach that places their protection at the heart of our operations. By safeguarding these individuals, we also contribute to the broader goal of upholding human rights. Our approach is multi-faceted and includes the following key themes:

- Designing our products and services with vulnerability considered at every stage
- Empowering our frontline colleagues through comprehensive training and equipping them with skills to identify and support vulnerable customers
- Monitoring and improving customer outcomes through continuous evaluation of the experiences and outcomes of vulnerable customers, using tools such as speech analytics, customer experience trackers, complaints analysis, product and service data and targeted thematic reviews of specific customer groups.

More on our approach to supporting vulnerable customers can be found on pages 11 to 13.

- Data privacy and security – Our approach to data protection and operational resilience can be found on pages 55 and 56.

### Colleagues

- Workplace and non-workplace stress – Our approach to supporting our colleagues' wellbeing can be found on pages 39 and 52.

- Verbal and aggressive behaviour towards colleagues – Our duty of care towards our colleagues is as important as the duty of care to our customers. Any instances of unacceptable behaviour will not be tolerated, and we aim to do all we can to support and protect colleagues. We also use root cause analysis to understand the source of distress and unacceptable behaviour, and seek to address instances where our processes might be adding additional or unnecessary stress.
- Discrimination and inclusion – Our approach to dealing with discrimination can be found on page 38. More on our inclusion and diversity approach can be found on pages 36 to 38.

### Supply chain

We recognise that supply chains are complex and that, whilst some industries and geographies present greater risks of exploitative labour practices, exploitation can exist at any location, and at any stage of the supply chain. We have identified the below themes as those with higher potential for incidence and harm.

- Unfair working conditions – Most of the third parties working directly with us operate under UK labour laws, where working standard obligations are considered high. The likelihood of excessive working hours, poor pay, or unhygienic or unsafe working environments is heightened within supply chain tiers, where there is less visibility.
- Forced labour – Research suggests that goods and services that utilise forced labour are likely to exist in most global supply chains.

Our approach to mitigating human rights risks in our supply chain can be found on pages 43 to 45 of this report, and in our Modern Slavery Act Statement.

# Metrics and targets

We have a number of measures that support our Mutual Good Commitments. Our progress against these measures over 2024/25 is set out over the following pages. Our Mutual Good Commitment measures were set prior to our acquisition of Virgin Money on 1 October 2024. Through this section, where we can report on progress covering the Group, we show **Group** and where the measure relates to the Nationwide sub-group business excluding Virgin Money, we show **NBS**. We also present new measures, where applicable, that will be introduced for 2025/26.

## We will offer customers a choice in how they bank with us, and support their financial resilience

| Our measures for 2024/25                                                                                                             | Our progress                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Measure valid for 2025/26 |
|--------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| <b>Group</b> Our Branch Promise: We promise to keep every one of our branches open until at least the start of 2028 <sup>101</sup> . | We have kept all our branches open. Following our acquisition of Virgin Money, we also extended our Branch Promise to cover Virgin Money branches (see page 10).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Y                         |
| <b>NBS</b> By 2025, we will protect 1.4 million customers with our Scam Checker Service <sup>102</sup> .                             | <p>We exceeded our target, protecting almost 1.5 million customers with our Scam Checker Service. Our Scam Checker Service enables customers of our Nationwide sub-group to check their payments with us before they make them, if they have concerns, providing additional support and reassurance.</p> <p>Usage of this service has been higher than expected, supported by more people using our branches (which is the main channel for use of our Scam Checker Service), and by our advertising approach and online prompts, which increased visibility and awareness of this service. This measure is being retired<sup>103</sup> and replaced with the measures on the next page.</p> | N                         |

<sup>101</sup>All our 605 Nationwide branches and 91 Virgin Money branches will remain open until at least 1 January 2028. Opening hours may vary. There may be exceptional circumstances outside of our control that mean we have to close a branch, but we will only do this if we do not have another workable option.

<sup>102</sup>Set against a baseline of 31 March 2022.

<sup>103</sup>Following recent changes to the Payment Systems Regulator (PSR) reimbursement rules, we no longer track this as a target measure. However, we continue to offer our Scam Checker Service to support our customers.

| New measures to be introduced from 2025/26                                                                                                                                 | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Measure valid for 2025/26 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| <b>NBS</b> By 2028, we will support 500,000 additional customers, who live in the least well off areas of the country, to develop positive savings habits <sup>104</sup> . | <p>Our calculation involves supporting the least well off in society within our customer base, identified by overlaying the Government's Index of Multiple Deprivation, which ranks areas of the country based on deprivation and affluence, on our customer base. Savings customers living in the most deprived 30% of areas in the country are considered to have developed positive savings habits if they have made a deposit into a Nationwide-branded savings account in four months within a consecutive six-month period<sup>105</sup>.</p> <p>We seek to support these savers through a range of products and initiatives. This includes through our competitive range of savings products, through savings tools such as Savings Goals, Roundups and Quick Saving, and through our SavingsWatch service, which informs registered members of changes to savings accounts, interest rates and new product launches. We also use marketing and advertising to build awareness, and we offer customers support with free Savings Reviews in our Nationwide branches.</p> | Y                         |
| <b>NBS</b> By 2028, customers will have used our digital initiatives and tools in over three million instances <sup>106</sup> .                                            | We will measure this target by considering the number of instances our customers have used our digital initiatives and tools. These include customers who have accessed our digital inclusion help and support tools on nationwide.co.uk, either through self-serving or being prompted to use these tools via Arti (our virtual assistant) <sup>107</sup> . It also includes customers who have received digital side-by-side conversations with our frontline colleagues <sup>108</sup> . In addition, it includes customers who have completed educational iPad demos in our branches, or self-serve digital skills lessons <sup>109</sup> , or who have participated in face-to-face digital lessons in branches <sup>110</sup> .                                                                                                                                                                                                                                                                                                                                           | Y                         |

<sup>104</sup>Set against a baseline of 31 March 2025.

<sup>105</sup>Customers that meet the criteria are included only once within our cumulative target, regardless of whether they met the criteria on multiple occasions within a three-year period.

<sup>106</sup>Set against a baseline of 31 March 2025. This target measures the number of instances a digital inclusion initiative or tool was used, and therefore may include multiple uses per customer.

<sup>107</sup>Across the Nationwide website and via Arti (our virtual assistant), we have over 40 links to online [Discover Digital demonstrations](#). Discover Digital is our digital adoption support platform which provides both customers and colleagues with interactive step-by-step demonstrations of how to transact digitally on the app or through the internet bank.

<sup>108</sup>Measured by the number of Discover Digital demonstrations accessed by our frontline colleagues when guiding our customers in digital conversations.

<sup>109</sup>Digital skills lessons are available to customers as a self-help facility through the home page of our [Discover Digital website](#). They are designed to provide learning for customers who are not digitally active, and may be excluded due to fear or lack of skills and support. They include content such as how to communicate online, how to be shop online and use price comparison websites, and how to protect your digital wellbeing.

<sup>110</sup>Each branch cluster, comprising of a group of local branches, and led by a senior manager, will deliver one digital lesson per month.

## We will help more people into safe and secure homes, both our customers who have relationships with us and more broadly

| Our measures for 2024/25                                                                                                                                                           | Our progress                                                                                                                                                                                                                                                                                                                                                                                                          | Measure valid for 2025/26 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| <b>NBS</b> By 2025, we will help 300,000 people, through our first time buyer proposition, to buy a home <sup>111</sup> .                                                          | We have exceeded our target, helping 373,000 people into a home, through our Nationwide-branded mortgages. This reflected a stronger first time buyer market than expected over the period, and the ongoing success of our Helping Hand proposition (see page 18). We are introducing a new three-year target for 2025/26, shown below.                                                                               | N                         |
| <b>NBS</b> By 2025, we will have provided £2 billion of new lending to support the social housing sector <sup>112</sup> .                                                          | We have exceeded our target, providing almost £2.5 billion of new lending to support the social housing sector. This reflected the evolution of our lending criteria, which enabled us to become more competitive and support a broader range of customers with their financing needs. We are introducing a new three-year target for 2025/26, shown below.                                                           | N                         |
| <b>NBS</b> We will ensure our new buy to let lending on rental properties meets our minimum standards, which are informed by and exceed the Decent Homes Standard <sup>113</sup> . | With many of our customers in rented accommodation, we seek to enable a private rented sector that works for the mutual good of both landlords and tenants. We inspect the buy to let properties on which we originate new loans through The Mortgage Works, to ensure they meet our minimum standards. Properties that do not meet these conditions must complete remedial work prior to us lending on the property. | Y                         |
| New measures to be introduced from 2025/26                                                                                                                                         | Description                                                                                                                                                                                                                                                                                                                                                                                                           | Measure valid for 2025/26 |
| <b>Group</b> By 2028, we will help 250,000 people, through our first time buyer proposition, to buy a home <sup>114</sup> .                                                        | We continue to focus on helping people, through our first time buyer proposition, into homes. Our new three-year target spans a shorter period than our previous target <sup>115</sup> . We are working to address the three main challenges that first time buyers face – affording monthly mortgage repayments, raising a deposit and being able to borrow enough to afford a property.                             | Y                         |
| <b>Group</b> By 2028, we will have provided £1.5 billion of new lending to support the social housing sector <sup>116</sup> .                                                      | Our target demonstrates our support for the social housing sector, aiming to increase the provision of social housing and benefit those in more vulnerable housing situations.                                                                                                                                                                                                                                        | Y                         |

<sup>111</sup>Set against a baseline of 30 November 2020. Our definition of a first time buyer is set out in the Glossary on page 66.

<sup>112</sup>Set against a baseline of 31 March 2022. Committed lending to the social housing sector includes new lending committed by Nationwide sub-group to both new and existing customers that results in an increase in the overall total lending commitment to that customer. It also includes refinanced facilities for existing customers of Nationwide sub-group. We refer to the commitment rather than balance, as some of our facilities to social housing customers are revolving credit facilities that provide flexibility on how and when facilities are drawn.

<sup>113</sup>A Decent Homes Standard in the private rented sector: consultation - GOV.UK

<sup>114</sup>Set against a baseline of 31 March 2025.

<sup>115</sup>Previous target: By 2025, we will help 300,000 people, through our first time buyer proposition, to buy a home (against a baseline of November 2020).

<sup>116</sup>Set against a baseline of 31 March 2025.

## We will make a positive difference for our customers, communities and society as a whole

| Our measures for 2024/25                                                                                                                         | Our progress                                                                                                                                                                                                                                                                                                                    | Measure valid for 2025/26 |
|--------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| <b>Group</b> We will commit at least 1% of our pre-tax profits <sup>117</sup> to charitable activities each year.                                | We met our target in 2024/25, committing more than £20 million to charitable activities. This included £18.7 million (2023/24: £15.5 million) as part the 1% of pre-tax profits, and also included £1.8 million of donations awarded by Virgin Money. More information can be found on page 21.                                 | Y                         |
| New measures to be introduced from 2025/26                                                                                                       | Description                                                                                                                                                                                                                                                                                                                     | Measure valid for 2025/26 |
| <b>Group</b> By 2027, we will have helped more than 200,000 people through our Nationwide Fairer Futures social impact strategy <sup>118</sup> . | Following the launch of our Nationwide Fairer Futures social impact strategy in June 2024 (see pages 22 to 23), we introduced a new target, to demonstrate our reach and impact on the causes we set out to support. Over 2024/25, we helped around 67,000 people through our Nationwide Fairer Futures social impact strategy. | Y                         |

<sup>117</sup>Our charitable commitment of 1% of pre-tax profits is based on average profits over the previous three years. For 2024/25, this preceded the acquisition of Virgin Money on 1 October 2024. Our commitment of £18.7 million included £17.0 million of charitable donations and £1.7 million relating to supporting activity and staff costs. From 2025/26, our 1% commitment will be used to fund the activities of Nationwide's social impact strategy and associated operational costs, the Nationwide Foundation, and the Virgin Money Foundation.

<sup>118</sup>Set against a baseline of 1 April 2024. This target measures our reach in terms of the number of individual beneficiaries across three of our charity partnerships: Centrepoin, Action for Children, and Dementia UK. Our partnership with The Royal Marsden Cancer Charity is not included in the measurement of this target as we are funding research studies and clinical trials which, by their nature, contribute towards knowledge advancement, rather than measuring the number of people reached. The measure is tracked with the support of a third party, Chrysalis Research, who have worked with these three charity partners to implement a reporting framework to accurately identify unique beneficiaries from the Nationwide Fairer Futures funded programmes. The data is collected and analysed on a quarterly basis.

## We aim to build a more sustainable world by supporting progress towards a greener society

| Our measures for 2024/25 <sup>119</sup>                                                                                                                                                                                                                                                                                      | Our progress                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Measure valid for 2025/26 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| <b>Group</b> We aim to reduce our scope 1 emissions that we control across our own business operations, in line with our 2030 scope 1 science-based target.                                                                                                                                                                  | Our Mutual Good Commitment measures reflect our intermediate (by 2030) science-based targets, as described in the Metrics and targets section of our Climate-related Financial Disclosures 2025, from page 23.                                                                                                                                                                                                                                                                                                                                                                                                                                               | Y                         |
| <b>Group</b> We aim to continue to source 100% renewable electricity for our own operations, in line with our 2030 scope 2 science-based target.                                                                                                                                                                             | Our scope 1 emissions have continued to reduce in comparison to previous years, and we are currently ahead of our intermediate (by 2030) science-based target pathway. We have also continued to source 100% renewable electricity, and are on track to achieve our scope 2 science-based target.                                                                                                                                                                                                                                                                                                                                                            | Y                         |
| <b>Group</b> We aim to reduce our scope 3 emissions for our mortgages, business lending, other secured lending activity, and our supply chain, by taking steps to reduce those emissions within our control and encouraging our customers and suppliers to do the same, in line with our 2030 scope 3 science-based targets. | We continue to take reasonable action to reduce our scope 3 emissions where feasible. Our upstream (category 1, 2 and 4) scope 3 emissions are partially within our control. We do not believe our scope 3 science-based target for our downstream residential mortgages portfolio can be achieved. These emissions account for the majority of our total scope 3 emissions. We have very limited control over our ability to reduce our scope 3 emissions and are reliant on significant government policy and consumer action to support progress towards them. For more information see pages 23 to 34 of our Climate-related Financial Disclosures 2025. | Y                         |
| New measures to be introduced from 2025/26                                                                                                                                                                                                                                                                                   | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Measure valid for 2025/26 |
| <b>Group</b> By 2028, we will increase our energy and environmental lending balances (which aim to support businesses or projects that enable the energy transition) by more than 50% <sup>120</sup> .                                                                                                                       | We will increase our energy and environmental lending from around £500 million in March 2025, to up to £800 million by 2028. Our aim is to support businesses or projects that enable the energy transition, such as renewable power projects (including wind, solar and hydropower). More information can be found on pages 5 and 6 of our Climate-related Financial Disclosures 2025.                                                                                                                                                                                                                                                                      | Y                         |

<sup>119</sup>More information on baselines can be found in our Climate-related Financial Disclosures 2025, from page 23.

<sup>120</sup>Set against a baseline of 31 March 2025.

## We will enhance our performance by better reflecting the diversity of our society

| Our measures for 2024/25                                                                | Our progress                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Measure valid for 2025/26 |
|-----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| <b>NBS</b> By 2028, our people will better reflect the wider society that we represent. | <p>Our seven measures span across gender, ethnicity, disability and sexual orientation. We achieved five of our seven diversity targets for March 2025, with improvements seen across all measures in the year, except for diversity of sexual orientation within the leadership population. For the two measures where targets were not achieved, representation of women in our leadership population improved to 36.7% (2024: 35.7%), whilst the proportion of colleagues identifying as bi-sexual, gay, lesbian or other sexual orientation (excluding heterosexual) in the leadership population decreased to 3.0% (2024: 3.2%).</p> <p>We will utilise our data and insights to identify where focus and action are needed to design inclusion into our processes, policies and practices. We will also continue to enhance our evaluation of data to better understand the impacts of the targeted interventions we take. More information on the work we are doing to progress inclusion and diversity can be found on pages 36 to 38.</p> <p>We are reviewing our combined inclusion and diversity measures to set appropriate targets for the combined Group that reflect our continued commitment to inclusion and diversity.</p> | Y                         |

All data is as at 31 March 2025, and is based upon headcount not FTE (full-time equivalent value) of employees directly employed by Nationwide (excluding Virgin Money).

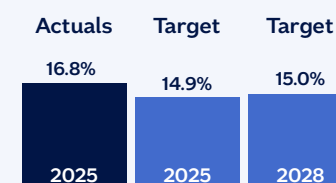
### Gender<sup>121</sup>

#### Leadership population<sup>122</sup>

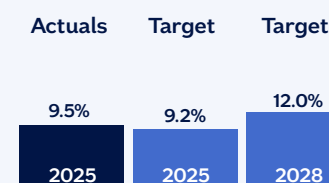


### Ethnicity<sup>123,124</sup>

#### All employees

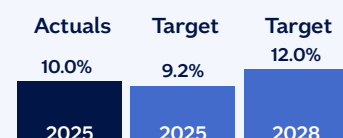


#### Leadership population<sup>122</sup>

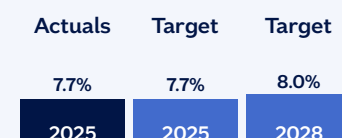


### Disability<sup>124,125</sup>

#### All employees

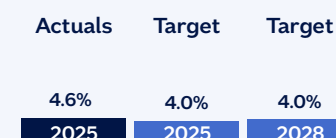


#### Leadership population<sup>122</sup>

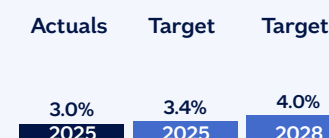


### Sexual Orientation<sup>124,126</sup>

#### All employees



#### Leadership population<sup>122</sup>



<sup>121</sup>Gender – Figures reflect female representation. Gender is as recorded in Nationwide's HR system.

<sup>122</sup>Leadership population – A targeted and broader leadership population comprising around 1,000 of our leaders.

<sup>123</sup>Ethnicity – Figures reflect Black, Asian, mixed and other. Excluded from the calculation are white majority and minority.

<sup>124</sup>The percentage of colleagues meeting this characteristic is based on their voluntary self-declaration recorded in Nationwide's HR system, which states that they consider themselves to belong to this characteristic.

<sup>125</sup>Disability – Figures reflect those identifying as disabled or as having a long-term health condition.

<sup>126</sup>Sexual Orientation – Figures reflect those identifying as bi-sexual, gay man, gay woman, lesbian and other. Excluded from the calculation are those identifying as heterosexual.

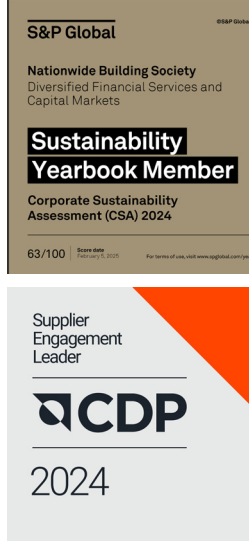
# Our ESG rating performance and industry partnerships

We recognise the importance of ESG rating agencies in providing our investors and other stakeholder groups with a holistic view of our sustainability performance. We engage with a number of ESG rating agencies and regularly participate in ESG surveys and assessments to support this. We also partner and engage with a number of industry organisations to further our progress and affect real change.

| ESG rating provider and rating scale applied                                                                                            | Our rating     | Date of last rating |
|-----------------------------------------------------------------------------------------------------------------------------------------|----------------|---------------------|
| <b>MSCI ESG Rating<sup>127</sup></b><br>Scale: AAA to CCC, AAA as a best possible score                                                 | AAA            | December 2024       |
| <b>Morningstar Sustainalytics ESG Risk Rating<sup>128</sup></b><br>Scale: 0–100 (Negligible to Severe Risk), 0 as a best possible score | 11.8, Low Risk | December 2024       |
| <b>ISS ESG Rating</b><br>Scale: A+ to D-, A+ as a best possible score                                                                   | C+, Prime      | January 2025        |
| <b>CDP Climate Change Disclosure</b><br>Scale: A to D-, A as a best possible score                                                      | B              | February 2025       |
| <b>S&amp;P Global ESG Score</b><br>Scale: 0–100, 100 as a best possible score                                                           | 64             | May 2025            |

### Industry partnerships

We continue to partner, and play an active role, with key organisations to grow our knowledge and create positive change.

<sup>127</sup>The use by Nationwide of any MSCI ESG Research LLC or its affiliates ("MSCI") data, and the use of MSCI logos, trademarks, service marks or index names herein, do not constitute a sponsorship, endorsement, recommendation, or promotion of Nationwide by MSCI. MSCI services and data are the property of MSCI or its information providers, and are provided 'as-is' and without warranty. MSCI names and logos are trademarks or service marks of MSCI

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# Glossary

| Item                                               | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Building Societies Association (BSA)</b>        | The collective voice for UK building societies, together with some of the larger credit unions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Business risk</b>                               | The risk that volumes decline, margins shrink, or losses increase relative to the cost or capital base, affecting the sustainability of the business and the ability to deliver the strategy due to external factors (macroeconomic, geopolitical, industry, regulatory or other external events) or internal factors (including the development and execution of the strategy).                                                                                                                                                                                            |
| <b>CDP</b>                                         | A not-for-profit charity that runs the global environmental disclosure system for companies, capital markets, cities, states and regions to manage their environmental impacts. Nationwide participates in the CDP questionnaire annually.                                                                                                                                                                                                                                                                                                                                  |
| <b>Consumer Duty</b>                               | FCA rules and guidance which set higher and clearer standards of consumer protection across financial services.                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Credit risk</b>                                 | The risk of loss as a result of a customer or counterparty failing to meet their financial obligations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Decent Homes Standard</b>                       | The Government's Decent Homes Standard sets mandatory minimum quality standards for social homes. The Government has committed to extending these standards to the private rented sector to raise housing standards for private renters, providing them with safer, decent quality homes, and bringing their rights into line with those of council and housing associations.                                                                                                                                                                                               |
| <b>EcoVadis</b>                                    | A sustainability ratings provider, that supports sustainability performance improvement for firms and their value chains. Nationwide partners with EcoVadis to monitor its suppliers' environment, labour, human rights, ethics and sustainable procurement activities.                                                                                                                                                                                                                                                                                                     |
| <b>Enterprise Risk Management Framework (ERMF)</b> | A framework that provides context and guidance for cohesive risk management activity. The framework is based on principal risk categories, establishing risk appetite and implementing risk management through the three lines of defence model.                                                                                                                                                                                                                                                                                                                            |
| <b>Energy Performance Certificate (EPC)</b>        | An EPC is a document which sets out the energy efficiency of a property. Produced by an accredited domestic energy assessor, an EPC provides an indication of how much it will cost to heat (both water and space) and light a property. EPCs also include recommendations for energy-efficiency improvements, the cost of carrying them out, and the potential savings that each one could generate. Energy efficiency is indicated using a traffic light system rating from A to G, based on Standard Assessment Procedure (SAP) points, with A being the most efficient. |
| <b>Financial Conduct Authority (FCA)</b>           | The statutory body responsible for conduct of business regulation and supervision of UK authorised firms. The FCA also has responsibility for the prudential regulation of firms that do not fall within the Prudential Regulation Authority's (PRA's) scope.                                                                                                                                                                                                                                                                                                               |
| <b>First time buyer</b>                            | A first time buyer is an individual who has not owned a property in the last three years. For a joint mortgage, if both applicants meet this definition, each is recognised as a first time buyer, otherwise, if one applicant does not meet the definition, neither is counted as a first time buyer.                                                                                                                                                                                                                                                                      |
| <b>Forbearance</b>                                 | Forbearance takes place when a concession is made on the contractual terms of a loan to a customer that is experiencing or about to experience financial difficulties.                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Joint Fraud Taskforce (JFT)</b>                 | A partnership between the UK Government, the private sector and law enforcement, to tackle fraud collectively and to focus on issues that have been considered too difficult for a single organisation to manage alone.                                                                                                                                                                                                                                                                                                                                                     |

|                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Joint Money Laundering Intelligence Taskforce (JMLIT)</b> | A partnership between law enforcement and the financial sector to exchange and analyse information relating to money laundering and wider economic threats.                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Loan to value ratio (LTV)</b>                             | A ratio which expresses the amount of exposure as a percentage of the value of the property on which it is secured. The Group calculates LTV on an indexed basis, such that the value of the property is updated on a regular basis to reflect changes in the market using either house price or commercial real estate indices.                                                                                                                                                                                                                            |
| <b>Money and Pensions Service (MaPS)</b>                     | A public body sponsored by the Department for Work and Pensions. It provides free and impartial debt advice, money guidance and pension guidance to members of the public. It also engages with HM Treasury on policy matters relating to financial capability and debt advice. Nationwide sub-group's Money Lessons respond to the MaPS goal to see two million more children and young people across the UK receiving a more meaningful financial education by 2030 (against a baseline of 2020).                                                         |
| <b>Multilateral development banks</b>                        | Supranational institutions set up by sovereign states, which are their shareholders. They have the common task of fostering economic and social progress in developing countries by financing projects, supporting investment and generating capital for the benefit of all global citizens. Nationwide includes bonds issued by multilateral development banks within its ESG bond holdings.                                                                                                                                                               |
| <b>Net-Zero Ambition</b>                                     | A UK-wide ambition to achieve an overall balance between GHG emissions produced and taken out of the atmosphere, keeping global temperature increases to below 1.5°C. We aim to support the transition to a net-zero economy.                                                                                                                                                                                                                                                                                                                               |
| <b>Operational and conduct risk</b>                          | The risk of impacts resulting from inadequate or failed internal processes, conduct and compliance management, people and systems, or from external events.                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Science-based targets</b>                                 | Emissions reduction targets set in line with the latest climate science. For more information, see our Climate-related Financial Disclosures 2025.                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Scope 1 emissions</b>                                     | Scope 1 emissions are direct emissions from owned sources, such as the fuel we burn to heat our buildings.                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Scope 2 emissions</b>                                     | Scope 2 emissions are indirect emissions from the generation and consumption of purchased electricity and heating.                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Scope 3 upstream – categories 1-8 – emissions</b>         | Indirect upstream emissions that occur in an organisation's value chain. Upstream emissions (GHG Protocol categories 1-8) cover emissions which result from the organisation's supply chain. The categories are: 1. Purchased goods and services; 2. Capital goods; 3. Fuel- and energy-related activities not included in scope 1 and 2; 4. Upstream transportation and distribution; 5. Waste generated in Operations; 6. Business travel; 7. Employee commuting; 8. Upstream leased assets.                                                              |
| <b>UK Finance</b>                                            | The collective voice for the UK banking and finance industry, representing around 300 firms across the industry. See <a href="#">About us   UK Finance</a> .                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>UN Global Compact</b>                                     | A voluntary initiative based on CEO commitments to implement universal sustainability principles and to take steps to support UN Sustainable Development Goals (SDGs). As a signatory, Nationwide has reinforced its commitment to social and environmental sustainability and its shared responsibility for a better world. See <a href="#">About the UN Global Compact   UN Global Compact</a> .                                                                                                                                                          |
| <b>UN Sustainable Development Goals (SDGs)</b>               | A collection of 17 interlinked goals adopted by all UN Member States in 2015, as part of the 2030 Agenda for Sustainable Development. The goals are a shared blueprint for achieving a better and more sustainable future for all. Nationwide's Mutual Good Commitments are most closely aligned to SDG 1 (No poverty), 5 (Gender equality), 7 (Affordable and clean energy), 8 (Decent work and economic growth), 10 (Reduced inequalities), 11 (Sustainable cities and communities), 12 (Responsible consumption and production) and 13 (Climate action). |

# Information to note

## Cautions about this report

This report is presented for information and reference purposes only and should not be relied upon or treated as giving investment advice. The information, statements and opinions contained in this report do not constitute a public offer under any applicable legislation, an offer to sell or solicitation of any offer to buy any securities or financial instruments, or any advice or recommendation with respect to such securities or other financial instruments. This report, the information, statements and disclosure included in this report are not formally part of any offering documents and are not contractually binding. This report is not intended to form part of any communication of any offering issued under this report and it is not intended to be an advertisement for the purposes of the UK Prospectus Regulation and investors should not make any investment decisions based on the information included in this report.

Where information contained in this report is based on reviews and analysis of our internal data, that data may derive from management systems separate from those that form part of our financial reporting internal controls framework. Where information is presented from a public or third party source, it has not been independently verified by Nationwide for its completeness, reasonableness or accuracy. Any third party opinion and views disclosed in this report are those of the third parties themselves, and not necessarily of Nationwide.

Whilst reasonable care has been taken in the preparation of this report and that exercise has been carried out in good faith, the information presented within the report is not warranted to be accurate or comprehensive and has not been externally audited. For certain information within the report, preparation has included various key judgements, assumptions and estimates.

Nationwide recognises that sustainability reporting is not yet subject to the same standardised disclosure framework as for traditional financial reporting, and that the sophistication of the models used continues to develop. This may result in non-comparable information or measures between organisations and between reporting periods as disclosure frameworks develop, and interpretations of terms used evolve over time.

## Forward-looking statements

Certain statements in this document are forward-looking with respect to plans, actions, potential actions, goals and expectations relating to the performance of Nationwide, including but not limited to Nationwide's Mutual Good Commitments. Such forward-looking statements can be identified by the use of forward-looking terminology, including but not limited to words such as "aims", "ambition", "believes", "could", "expects", "goal", "intends", "may", "plans", "potential", "seeks", "should", "target", or the inverse of those terms. Although Nationwide believes that the expectations reflected in these forward-looking statements are reasonable in the context of the caveats

outlined as of the date hereof, Nationwide can give no assurance that these expectations will prove to be an accurate reflection of actual results, which may differ materially from the plans, actions, potential actions, goals and expectations expressed or implied in these forward-looking statements. By their nature, all forward-looking statements involve risk and uncertainty because they relate to future events and may be affected by circumstances that are beyond the control of Nationwide including, amongst other things, UK and global economic and business conditions, market-related risks such as fluctuations in interest rates and exchange rates, the impact of competition, changes in customer preferences, risks concerning borrower credit quality, delays in implementing proposals, the timing, impact and other uncertainties of future acquisitions or other combinations within relevant industries, risks relating to sustainability and climate change, the policies and actions of regulatory authorities and the impact of evolving UK and global legislation, regulations and frameworks. Due to such risks and uncertainties, Nationwide cautions readers not to place undue reliance on such forward-looking statements. Nationwide undertakes no obligation to update any forward-looking statements whether as a result of new information, future events or otherwise.