

# Modern Slavery Act (2015)

## Statement 2025

# Contents

<b>Overview</b>	<b>3</b>
- Our commitment	
- Transparency and reporting	
- Nationwide's acquisition of Virgin Money	
- About Nationwide	
<b>Detect and disrupt</b>	<b>5</b>
- Policies	
- Risk assessment and management	
- Due diligence: customers, colleagues (including Raising a concern), supply chain	
<b>Support survivors</b>	<b>13</b>
- Customer vulnerability	
- Inclusive banking	
<b>Raise awareness</b>	<b>15</b>
- Colleague training and awareness	
<b>Measurement and governance</b>	<b>16</b>
- Our progress and ambitions	
- Measuring effectiveness	
- Governance and statement review	

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

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and applies to Nationwide Building Society (**Nationwide**) and its subsidiaries, including but not limited to, Virgin Money UK PLC (**Virgin Money**), Clydesdale Bank PLC (**Clydesdale Bank**) and The Mortgage Works (UK) PLC (**The Mortgage Works**). This statement refers to the financial year ending 31 March 2025. This is the tenth such statement Nationwide has published.

Terms used in this report	
<b>Nationwide / the Group</b>	Nationwide Building Society and all consolidated subsidiaries, including the 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</b>	Virgin Money UK PLC and its consolidated subsidiaries

# Overview

## Our commitment

The finance industry is used by perpetrators of modern slavery as a mechanism to access and manage their profits and to exploit their victims. Slavery is also thought to exist in every global supply chain.

We remain committed in our efforts to detect and deter modern slavery, throughout our business, operations and supply chain. We check our suppliers have controls in place, and where needed, we work with them to strengthen these controls to reduce the risk of modern slavery.

Customers who find themselves in vulnerable circumstances are at greater risk of financial harm and exploitation. We remain committed in our efforts to understand and reduce the risk of harm for our customers, and to evolve our ability to identify the signs of criminality and victimisation.

Our well-established reporting mechanisms enable colleagues and partners to raise suspicions of modern slavery, while our policies and learning options support our workforce in identifying and mitigating these risks. We work with external organisations to help progress systemic

change, sharing insight and intelligence to reinforce the positive action that can be taken on a wider scale.

Nationwide is committed to setting new standards for fairer practices and operating as a socially responsible business, as we deliver on our purpose of Banking – but fairer, more rewarding, and for the good of society. Working to eradicate modern slavery is an important part of how we bring that commitment to life.



**Catherine Kehoe**  
Chief Customer Officer

## Transparency and reporting

We are committed to supporting the Ten Principles of the [United Nations \(UN\) Global Compact](#) in the areas of Human Rights, Labour, Environment and Anti-Corruption, which includes the elimination of forced and compulsory labour and the abolition of child labour.

We are a signatory to the [UN Principles for Responsible Banking](#), a framework that supports alignment with the UN Sustainable Development Goals (SDGs) and the Paris Climate Agreement.

Reinforcing our own values, we are further guided by the principles held by the International Labour Organisation (ILO).

We are members of industry groups such as the [UN Global Compact UK Modern Slavery Working Group](#), and we support Public-Private Partnership engagement.



**SDG 8** – promoting productive employment and decent work, and helping to eradicate modern slavery



**SDG 10** – seeking to reduce inequalities faced by vulnerable and marginalised groups

## Nationwide's acquisition of Virgin Money

Following the acquisition of Virgin Money, Nationwide has changed its accounting reference date to 31 March. Where reference is made to the 'year ended' 31 March 2025, for the Nationwide sub-group, including The Mortgage Works, this represents the 361-day period from 5 April 2024 to 31 March 2025. For Virgin Money and each of its subsidiaries, including Clydesdale Bank, this relates to the period from 1 October 2023 to 31 March 2025.

The subsidiaries of the Nationwide sub-group, which includes The Mortgage Works but excludes Virgin Money and its subsidiaries, rely on Nationwide for the infrastructure and resources they need to operate, including the goods and services, resources, and workforce. Virgin Money subsidiaries, which includes Clydesdale Bank, are similarly reliant on Virgin Money. Each subsidiary's supply chains are, effectively, their respective parent's supply chains, and are subject to their respective policies on modern slavery and human trafficking. In very limited circumstances, we may allow a subsidiary to identify and onboard a third-party supplier independently, but we maintain oversight of the subsidiary's policies and processes and ensure there is an equivalent level of protection and governance.

A full list of our subsidiaries can be found in our Annual Report and Accounts 2025.

## About Nationwide

The combination of Nationwide's 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. Following our acquisition of Virgin Money on 1 October 2024, we have a connection with one in three people in the UK.

Our purpose-led strategy, centred around **Banking – but fairer, more rewarding, and for the good of society**, helps us do business in a responsible and sustainable way.

- We deliver retail banking products and services to our customers by helping them to manage their everyday finances, own a home, and save for the future.
- 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 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).

Across the Group, we employ around 26,000 colleagues and also engage with contingent workers (including contractors and temporary workers). Our headquarters is in Swindon, and we have almost 700 branches across the UK.

We have around 1,600 suppliers, who provide us with a range of goods and services, including advertising, distribution, facilities management, insurance, IT hardware, software and support, print and mailing, professional services, recruitment, and more. We source mostly from companies based in the UK, but we have relationships across the globe.

# Detect and disrupt

Our respect for human rights is aligned with the United Nations (UN) Guiding Principles on Business and Human Rights, and those codified in international law through the International Bill of Human Rights and the International Labour Organisation (ILO). Our policies and statements underpin our commitment to respect human rights and to address the risks of modern slavery.

## Policies

<b>Human rights</b>	Articulates our commitment to protect and support human rights, including freedom from slavery and forced labour.	<ul style="list-style-type: none"> <li>• <a href="#">Human Rights Standard</a></li> <li>• <a href="#">Nationwide Code of Conduct</a></li> <li>• <a href="#">Virgin Money Code of Conduct</a></li> </ul>
<b>Labour rights</b>	Helps colleagues to understand our commitment to the decent working practices that promote and protect labour rights.	<ul style="list-style-type: none"> <li>• <a href="#">Labour Rights Standard</a></li> <li>• <a href="#">Virgin Money Diversity and Inclusion Policy</a></li> </ul>
<b>Economic crime</b>	The principles and requirements for creating an anti-economic crime culture, to detect, deter and, where possible, prevent economic crime.	<ul style="list-style-type: none"> <li>• <a href="#">Nationwide Economic Crime Policy Statement</a></li> <li>• <a href="#">Virgin Money Anti-Bribery and Corruption Policy</a></li> </ul>
<b>Code of conduct</b>	The policies, behaviours, and commitments that ensure we operate ethically and with integrity, for business and people.	<ul style="list-style-type: none"> <li>• <a href="#">Nationwide Code of Conduct</a></li> <li>• <a href="#">Virgin Money Code of Conduct</a></li> </ul>
<b>Whistleblowing</b>	Encourages individuals to raise suspected wrongdoing or concerns regarding unethical conduct, including those that might indicate modern slavery, without fear of negative consequences.	<ul style="list-style-type: none"> <li>• <a href="#">Nationwide Whistleblowing Policy Statement</a></li> <li>• <a href="#">Nationwide Whistleblowing Policy for Suppliers</a></li> <li>• <a href="#">Virgin Money Whistleblowing Policy</a></li> </ul>
<b>Supplier codes</b>	Outline the minimum standards third-party suppliers are expected to uphold, including those related to ethical working conditions and anti-slavery approaches.	<ul style="list-style-type: none"> <li>• <a href="#">Nationwide Third Party Code of Practice</a></li> <li>• <a href="#">Nationwide supplier policies</a></li> <li>• <a href="#">Virgin Money Supplier Code of Conduct</a></li> </ul>

## Risk assessment and management

We do not tolerate modern slavery. However, given the scale of the modern slavery problem in the UK and across the world, we recognise the inherent risk we face by simply operating our business and working with third-party suppliers. We have controls and mechanisms in place to help us identify, prevent and disrupt practices that enable modern slavery. These include due diligence processes, risk assessments, and escalation processes embedded across our operations and supply chains. We convene internal Modern Slavery Forums, bringing together representatives from across the business to collaborate, share insights and strengthen our collective response.

We recognise that the greatest risks of modern slavery often lie among our customer base, particularly among vulnerable individuals who may be subject to coercion or exploitation, and deeper within our supply chains, where visibility and oversight may be more limited.

To mitigate these risks, we maintain strong controls to identify and protect vulnerable groups – whether customers, colleagues, or suppliers – and to uphold standards that enable decent work<sup>1</sup> throughout our value chain. Ongoing monitoring, supplier engagement and continuous improvement are central to our approach.

Customers	Colleagues	Suppliers
May be victims, perpetrators or facilitators of modern slavery.	Require strong controls around recruitment, decent work and speaking up.	Workers could experience poor working conditions and labour exploitation. Risks are greater further down the tiers of our supply chain, with less visibility.

Over the year, our Nationwide sub-group undertook a human rights saliency exercise, in which the potential for modern slavery was recognised across both our customer base and supply chains. This included the risk of financial abuse and exploitation of vulnerable customers, particularly those at risk of coercion or control, and forced labour and unfair working conditions among supply chain workers. This Statement outlines some of the ways in which we are responding to these risks.

## Due diligence

### Customers

Our customers include our members as owners (who have a Nationwide-branded current account, mortgage or savings), along with a broader set of customers across the Group who hold retail banking products with us, as well as buy to let customers and business banking customers.

We recognise that, among our customers, there are likely to be both perpetrators and victims of modern slavery. Criminals involved in modern slavery may seek to use our products and services to facilitate their activities, and to launder the proceeds of their crimes. Controls, initiatives and external engagement activities help us to prevent and disrupt this criminality, and our services seek to help our most vulnerable customers.

### Economic crime

We take our obligations and responsibilities to reduce both the risk of modern slavery and of being used to facilitate economic crime seriously. We follow an industry-standard 'three lines of defence' approach to managing risk. 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). We regularly review these controls to incorporate any new legislation, industry guidance, and changing criminal methods, to mitigate economic crime risks covering money laundering, terrorist financing, bribery and corruption, sanctions, tax evasion, and fraud (both internal and external). These controls support the mitigation of modern slavery-related offences in our operations.

Engaging with other regulated firms, non-government agencies, government, and law enforcement partners deepens our understanding of the threat modern slavery poses to our businesses and our customers. During the year, collaboration with a modern slavery charity and engagement with Public-Private Partnerships activities has helped inform ongoing work to enhance our controls. We continue to assess modern slavery as an important threat.

When incidents of concern or customer vulnerability occur, we will actively collaborate with local Police Forces and utilise the rapid response Banking Protocol initiative where appropriate. By taking action when a potential offender is present, we provide law enforcement with the best opportunity to disrupt criminal activity and ensure the safeguarding of any victim.

<sup>1</sup>International Labour Organization.

### Transaction monitoring

We conduct transaction monitoring on customers, looking for behaviours and patterns of transactions linked to specific high-risk factors relating to human trafficking and modern slavery. The insights and intelligence we gather inform the criteria used to identify potential exploitation and proceeds of modern slavery. In compliance with our obligations, cases will be reported to the National Crime Agency where a suspicion has been identified.

We are prepared to exit customer accounts where we believe modern slavery may be occurring. Circumstances of a customer who may be vulnerable or exposed to exploitation are considered in the account review process, including escalations to senior management if required. The engagement of external agencies, including law enforcement, will also occur.

We continue to use external intelligence to assess our internal threats, and to create ever more sophisticated typologies, tools, and controls to identify suspicious behaviour.

### Money mules

Money mules are individuals who, knowingly or unknowingly, allow their bank accounts to be used to receive and transfer illicit funds. Mules may be recruited through job scams, fake investment opportunities, or online fraud. Vulnerable individuals may become money mules, and this can have serious legal and financial consequences.

To help combat this threat, we collaborate with external partners and Public-Private Partnerships. This helps us remain aware of the latest trends and indicators, and ensure frontline colleagues, who are most likely to be able to spot indicators of modern slavery, remain aware of the typologies and mule indicators.

We continue to explore innovative techniques to improve our detection of mule type behaviour and increase the visibility of suspicious account activity.

Our Nationwide scams guide<sup>2</sup> aims to build customer awareness on the risks of scams, including money mule scams, and on receiving funds from the proceeds of crime (including modern slavery).

### Private landlords

People's homes can become sources of exploitation. Renting from a private landlord, rough sleeping, and sofa surfing can increase vulnerability and make someone a potential target for exploitation. For others, the accommodation itself can be directly linked to their exploitation.

We inspect the buy to let properties on which we originate new loans to through The Mortgage Works, to ensure they meet our minimum standards, which are informed by and exceed the Decent Homes Standard. Teams are trained to spot the signs of modern slavery and escalate any suspicions through our modern slavery reporting mechanisms.

### Business banking

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.

Virgin Money's Sensitive Sectors Statement<sup>3</sup> sets out the industry sectors, activities, and customers where ESG risks are considered unacceptably high, and where we have limited or no lending appetite. In addition to Sensitive Sectors, Virgin Money applies an additional level of credit assessment approval in other heightened risk sectors based on the ESG risks presented.

Our Credit Policy requires us to assess ESG risks which could impact business lending customers more broadly. We consider environmental risk and social issues in the assessment process, including human rights and modern slavery risks, and community and societal impact.

## Colleagues

We actively monitor and mitigate the risk of modern slavery within our operations. As a UK-based financial services provider, this risk is considered low, however we remain vigilant and proactive. We have robust controls, policies, and practices to ensure our people are not involved in modern slavery, whether as victims, perpetrators, or facilitators. By promoting decent work<sup>4</sup> and maintaining high labour standards, we seek to mitigate the risk of exploitation.

Our Codes of Conduct, as well as our Labour Rights Standard, guide colleagues on the behaviours and working practices they can expect while working with us. They cover areas such as freedom of association and collective bargaining, addressing discrimination and pay gaps, and ensuring health and safety.

<sup>2</sup>[How to spot a scam.](#)

<sup>3</sup>[Virgin Money sensitive-sector-statement.pdf.](#)

<sup>4</sup>[International Labour Organization.](#)



Inclusion and diversity is embedded as part of our people leader goals. We aim to ensure that people- and talent-related decisions and processes are inclusive, fair, and free from bias. Our people policies are crafted in consultation with our staff unions (Nationwide Group Staff Union (NGSU) and Unite the Union). This collaboration provides additional avenues for raising concerns.

Our Employee Networks also provide opportunities for colleagues to actively share insights and opinions, and to help shape people-related policies and supporting initiatives.

### Employee vetting

As part of our efforts to limit the risk of forced and compulsory labour in our workforce, we ensure that all newly hired employees and contingent workers complete background checks before joining us. These checks confirm their identity, validate their personal information and work history, and highlight any warning signs, including those that might indicate modern slavery. All verbal and written offers of employment or engagement, along with confirmation of start dates, are contingent upon candidates providing all required permissions, information, and documentary evidence.

### Responsible recruitment

Our resourcing policies prohibit charging recruitment fees to workers. We recognise the risk of debt bondage arising from the use of recruitment fees and will never ask job applicants to pay recruitment costs, at any point in the recruitment process. Where migrant labour is used, recruitment suppliers and our own Nationwide/Virgin Money businesses will pay for all recruitment-related fees and costs (with the exception of personal visa costs), in line with the Employer Pays Principle<sup>5</sup> and the International Labour Organisation's definition of recruitment fees and costs<sup>6</sup>. We will, similarly, never partake in deliberate practices to underpay, delay, or withhold wages, enforce involuntary overtime, or withhold identity documents.

At our Nationwide sub-group, permanent hiring is normally managed through our strategic recruitment partner, who is a member of the Recruitment and Employment Confederation (REC)<sup>7</sup> and adheres to their principles, including respect for ethical international recruitment. Where contingent resource is required across the Group, only approved third-party recruitment suppliers may be used, and we expect the same high standards and principles as we do when recruiting new colleagues. We review specific personal information of contingent workers to identify any warning signs and prohibit activities that might increase the risk of debt bondage.

We continually review indicators of modern slavery and have procedures, outside of pre-employment screening, to identify any further indicators within our workforce.

### Facilities management

We use a combination of direct employment and third-party resources to fulfil cleaning and security roles in our administration centres, branches, and other sites. We work with recruitment agencies who evidence strong policies and controls to protect their workers.

At our Nationwide sub-group, when construction is taking place at our sites, posters are displayed to help workers understand their rights, outlining the working conditions they should expect in relation to freedom of movement, contract, pay and working hours, and whistleblowing channels. The display of these posters is monitored through health and safety quality audits.

For non-English speaking colleagues, our Nationwide sub-group facilities teams are offered 'English as a foreign language' courses. Assistance is also available to ensure understanding when completing e-learning modules.

### Paying a living wage

Paying a living wage reduces poverty, improves employee wellbeing, and boosts economic growth by ensuring workers can afford basic necessities and spend more on goods and services. It also enhances business performance and promotes social equality by reducing income inequality and improving job satisfaction.

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.

We also encourage Nationwide's third-party suppliers to pay the real Living Wage through our Third Party Code of Practice<sup>8</sup>, our tender questions, and our standard contractual terms.

<sup>5</sup>HRB - The Employer Pays Principle.

<sup>6</sup>ILO's definition of recruitment fees and related costs.

<sup>7</sup>REC - Code of Professional Practice.

<sup>8</sup>Third Party Code of Practice.



### Colleague wellbeing

Financial hardship, addiction, and other vulnerable life phases can expose individuals to further harms, including exploitation. We take our role in supporting our colleagues' physical, mental, emotional, social, and financial wellbeing seriously. Our colleague support activities are dynamic and responsive to the needs of our people. We have a series of policies, resources, and provisions designed to support colleagues with their physical and mental wellbeing, as well as other practical support. We aim to facilitate a positive culture and safe environment, which encourages open and honest conversations.

We use data and insight to understand pressure points experienced by our colleagues, and to inform where we might build additional support. Last year, we launched a new mental health and wellbeing online platform within our Nationwide sub-group. We are monitoring the trends emerging from this platform to understand where our colleagues need more support. Virgin Money's wellbeing online platform also promotes wellbeing resources, support and initiatives.

#### Examples of colleague wellbeing initiatives include:

- Employee Care 24/7 helplines - offering free counselling, legal information and debt support
- Wellbeing intranet pages signposting support
- Employee Network Groups – a safe space to talk
- Online wellbeing platforms – covering mental health and wellbeing topics
- Healthcare Plans
- Mental Health First Aiders
- Domestic abuse policy and allies

### Engaging with colleagues

We invite all our colleagues to share their views and feedback with us. We gather insights through regular colleague surveys, listening events, and through engagement with employee network groups and staff unions. These engagement channels provide opportunities to understand the challenges colleagues face, including whether they are experiencing harm or difficulties. Engagement forums hosted by executive and non-executive directors offer colleagues the opportunities to raise issues directly with the Board.

We have processes to monitor and manage working conditions with our trade unions and with Executive Committee members, including our Group Chief People Officer, who has internal responsibility for labour rights. These processes provide a route for escalating significant labour rights issues and contain provisions for external mediation should it be required to resolve an issue or dispute.

We review our policy suite and related practices that protect labour rights annually. Risk reports and key performance indicators are presented to our Group Risk Committee by the Chief People Officer. These outline potential and emerging risks to our workforce and actions to respond to them.

### Raising a concern

We actively encourage our colleagues, contingent workers, work placement students and any other parties with whom we have a business relationship to speak up and raise concerns, including suspicions of modern slavery. Concerns can also be raised confidentially or anonymously through our well-established whistleblowing channels.

We have a zero-tolerance approach to the victimisation of any person raising a genuine concern under our Whistleblowing policy. All employees and contingent workers complete a mandatory annual 'Speak Up' e-learning on our whistleblowing procedures.

Our unions (Nationwide Group Staff Union (NGSU) and Unite the Union) help to ensure we are supporting and protecting our colleagues and provide additional ways for our colleagues to raise concerns. We also encourage our suppliers to share their concerns, as outlined in our supplier policies<sup>9</sup>.

This year, we will add modern slavery as a reportable category in our whistleblowing process, and include it in the list of reportable concerns within our whistleblowing policy.

A more detailed breakdown of concerns raised through our whistleblowing process can be found in our Annual Report and Accounts 2025.

0 concerns related to modern slavery during 2024/25

87%	of colleagues at Nationwide sub-group	feel safe to speak up <sup>10</sup>
81%	of colleagues at Virgin Money	

<sup>9</sup>Nationwide Third Party Code of Practice and Virgin Money Supplier Code of Conduct.

<sup>10</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. 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.

## Supply chain

Our third-party suppliers are defined as those organisations that provide goods or services to us. These organisations support us in operating our business. We are committed to working with our third parties to mitigate modern slavery risk.

Modern slavery in global supply chains is a significant risk. Supply chain workers could experience poor working conditions and labour exploitation. Risks are greater further down the tiers of our supply chain where there is less visibility.

We have controls in place across the key stages of our supplier relationships, from onboarding and contracting, to ongoing monitoring of Environmental, Social and Governance (ESG) performance.

### Onboarding due diligence

Prospective suppliers considered to be of medium or higher ESG risk (based on supplier location, spend value and spend category) are asked questions on modern slavery, including their own compliance with the UK Modern Slavery Act. 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 onboarding.

We also conduct screening for adverse media, sanctions, and politically exposed persons.

### Contracting

Our standard agreements with third-party suppliers include provisions for ethical trading, including anti-modern slavery practices.

We will work in support of a third party to tackle instances of modern slavery they may uncover, rather than simply ceasing to work with them. We believe this approach is consistent with the principles that the Act promotes.

### Ongoing monitoring

Various controls are used to monitor the ESG performance of contracted third parties depending on the type of relationship. This includes continued adverse media, sanctions and politically exposed persons screening, as well as ongoing discussions between relationship managers and third parties on contractual obligations and outcomes of sustainability assessments.

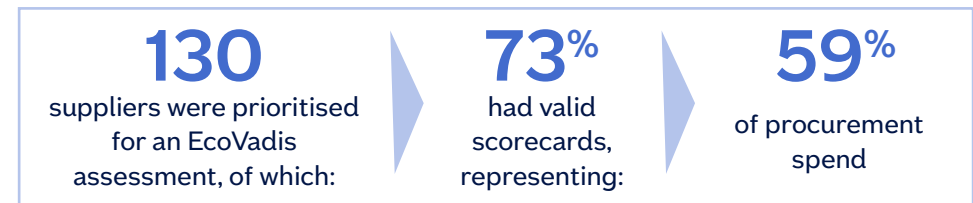
In addition, our Nationwide sub-group conducts evidence-based controls testing on a prioritised set of third parties to check compliance with the Third Party Code of Practice, and to request action where gaps are identified.

### EcoVadis sustainability ratings

We continually monitor and manage third-party supplier sustainability performance. Our Nationwide sub-group works with EcoVadis, an international sustainability ratings provider, to assist our efforts, and we plan to identify which Virgin Money suppliers we will onboard onto the same platform. The EcoVadis assessment includes a module on human and labour rights, with questions relating to modern slavery, and a module on sustainable procurement, with questions on how social standards are checked throughout the supply chain.

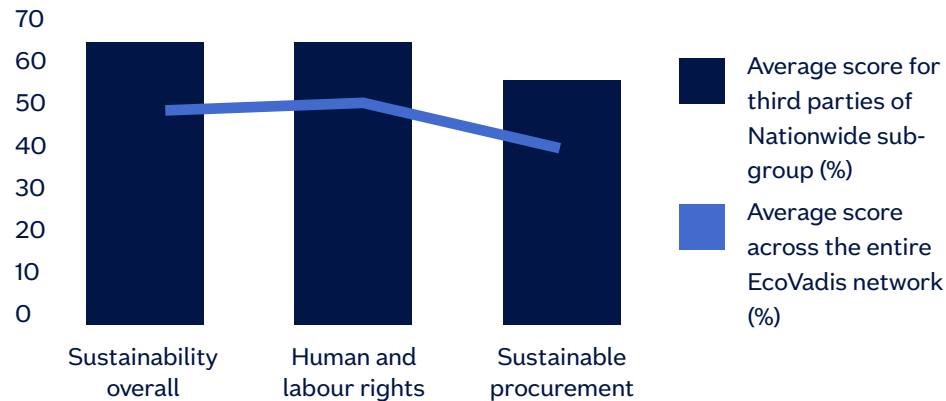
At our Nationwide sub-group, we have been gradually onboarding existing third-party suppliers to the EcoVadis platform since 2021. In 2024, we conducted a review to prioritise which third parties we would request to take an EcoVadis assessment, focused on strategic relationships, material services, and those presenting the greatest ESG risk or opportunity.

By the end of 2024:



We request that third parties obtain a sustainability rating of at least 45%, which is the minimum score that EcoVadis considers to be 'Good' corporate sustainable management. Where a third party scores below 45%, we ask that corrective action is taken ahead of their next annual assessment. At the end of 2024, two third parties had scores below 45%.

### EcoVadis sustainability ratings (for the calendar year 2024)



### Risk assessment and management

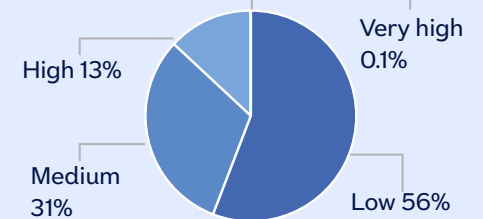
We refresh our assessment of supply chain modern slavery risk on an annual basis using external data sources, such as the latest Trafficking in Persons report, Gangmasters and Labour Abuse Authority (GLAA) industry profiles, Know The Chain benchmarks, and UN Global Compact high-risk sectors. We assign an overall modern slavery risk rating to each third party using a weighted average assessment of category, country, and spend. Category has the highest weighting, as we believe this is more indicative of modern slavery risk.

This year, we expanded our risk assessment across the Group to understand key modern slavery risks across the collective supply chain. Overall, 56% of our third-party relationships were identified as low risk, 31% medium risk, 13% high risk, and 0.1% very high risk (see pie chart opposite). Our highest risk third party categories included branded goods, construction and facilities, hardware, and logistics. These sectors are particularly high-risk for modern slavery and poor working conditions, due to structural vulnerabilities in their operations and supply chains.

Third-party suppliers identified as high or very high risk will be reviewed for inclusion in our EcoVadis programme, in instances where they are not already included.

### Third party modern slavery risk ratings

The proportion of our suppliers, across the Group, assigned each of the modern slavery risk ratings, based on our annual assessment in the year ended 31 March 2025.



Branded goods include, but are not limited to, branch uniforms, payment cards, stationery and signage. The manufacturing industry, including branded goods, often involves rapid production, low costs, and opaque supply chains with subcontracting. Workers in these sectors can face poverty wages, excessive hours, and hazardous conditions, with women and children disproportionately affected<sup>11</sup>.

Construction and facilities are utilised to manage and maintain our administration and branch sites, with facilities including services such as cleaning, catering, and security. As labour-intensive industries, these sectors can often involve recruitment of migrant and temporary workers, who may be more vulnerable to debt bondage and confiscated documents. The UK construction sector, for example, is noted for its high risk of forced labour due to subcontracting layers and isolation of workers, as well as unsafe working practices<sup>12</sup>.

Hardware involves the manufacturing of electronic components and devices. The sector has complex global supply chains, with raw materials often sourced from high-risk regions where child labour and forced labour are prevalent. Workers in this sector may endure dangerous tasks, such as exposure to toxic chemicals, without adequate protections<sup>13</sup>.

Logistics, including warehousing and transport, faces risks from fragmented employment models, reliance on agency workers, and limited oversight in remote or unregulated hubs. Subcontracting in logistics can obscure accountability, enabling labour abuses such as wage theft and coercive working conditions<sup>14</sup>.

Across all these sectors, systemic issues like price-driven competition, inadequate grievance mechanisms, and insufficient due diligence, exacerbate these risks.

<sup>11</sup>How brands and consumers can fight modern slavery and child labour in fashion | Walk Free.

<sup>12</sup>Construction and the Modern Slavery Act: Tackling Exploitation in the UK | CIOB.

<sup>13</sup>What BS 25700 Means for Modern Slavery Risk Management | Action Sustainability.

<sup>14</sup>PPN 009: Guidance on tackling modern slavery in government supply chains (HTML) - GOV.UK.

**Enhanced due diligence**

At our Nationwide sub-group, we conduct enhanced monitoring within certain higher-risk areas of our supply chain. For example, Nationwide's uniform supplier is contractually required to ensure Sedex Members Ethical Trade Audits (SMETA)<sup>15</sup> are conducted annually, at each factory contracted to manufacture their garments. Their independent auditor reports outline whether any element of the Ethical Trading Initiative (ETI) Base Code appears to have been breached and any corrective action that is required, whilst also highlighting any positive practices at the site. The audits form part of the uniform team's monthly scorecard and feature in a monthly review of any non-conformances.

**Case study: Supplier voice survey**

In early 2025, we ran an anonymous survey to get feedback from key third parties of our Nationwide sub-group on their experience working with us, as well as providing an opportunity for comment and suggestions.

The questions included topics such as whether we provide sufficient time to respond to requests, are considered in our approach to reducing duplication of information submission across the industry, are conscientious of our impacts on their working conditions, treat their employees with respect, and act on their feedback, amongst other areas.

The results are being reviewed and will be used to inform our next steps to support responsible purchasing practices.

<sup>15</sup>SMETA is Sedex's social auditing methodology that assesses a site and whether it meets the standards of the ETI's Base Code and local laws.

# Support survivors

## Customer vulnerability

Modern slavery is a complex and often hidden economic crime, rooted in abuse and exploitation. It disproportionately affects individuals in vulnerable circumstances. People experiencing homelessness, limited English language skills, substance misuse, financial hardship, learning difficulties or those at the extremes of ages are particularly at risk of being targeted by perpetrators.

Survivors of modern slavery often face significant barriers to financial independence. They may lack access to bank accounts, have limited trust in financial institutions, or be unaware of the banking services available to them. In some cases, fraudulent or criminal activity may have been carried out using accounts in their name, further complicating their financial recovery and increasing their vulnerability to re-exploitation.

It is important that our customer-facing colleagues are equipped to recognise and respond to signs of vulnerability. We support them with training, practical toolkits and clear guidance for supporting vulnerable customers. For more complex or sensitive situations, our specialist customer support teams are available to provide assistance.

Vulnerability is often multi-faceted and may be temporary or long-term. An understanding of its complexity is essential to safeguarding our customers, supporting their recovery, and preventing further harm.

### Understanding customer vulnerability

It is important that we recognise the circumstances in which customers may experience challenges in managing their finances, or when interacting with us. We have processes in place to help identify and support customers experiencing vulnerability. This includes the collection and analysis of relevant data to help us further improve our processes and training with respect to customer vulnerability.

To deepen our understanding, we conduct in-depth analyses to understand the experiences of vulnerable customer groups. These insights are informed by collaboration with specialist charities and support organisations, engagement with individuals who have lived experience of vulnerability, and ongoing desktop research.

## Identifying and recording customer vulnerability

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.

Our colleagues are trained to identify indicators of vulnerability and to engage in sensitive, informed conversations with customers. These discussions are aligned with the Financial Conduct Authority's (FCA) 'Tell Us Once' principle, ensuring that support needs are recorded accurately and do not need to be repeatedly disclosed. Our Nationwide sub-group is a founding member of the 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.

## Effective communication solutions

Customers who have limited English language skills, hearing or speech impairments, or reduced cognitive capacity may face significant challenges when accessing financial services. This can include difficulty understanding available products and services, navigating support channels, or effectively communicating their needs. Such barriers might also increase their risk of financial exclusion or exploitation.

To ensure equal access to our services, support, and protections, we are committed to providing effective and inclusive communication solutions. As part of this, we have undertaken in-depth research into the impact of limited English language skills and communication barriers on customer experience.

Over the year, we have introduced several targeted initiatives, including:

- Speak Easy cards in our Nationwide branches - visual communication cards designed to help customers navigate key stages of banking journeys using simple images and icons.
- Easy Read guides on our Nationwide website - accessible guides covering common banking topics such as fraud and scams and account opening. These guides use simple language and images, and were developed in partnership with Mencap, a UK charity that supports people with learning disabilities.
- Translation services - we are piloting new translation services in some Virgin Money branches, to complement our existing solutions.

### Domestic, economic and financial abuse

The FCA sets a high standard for consumer protection, with a strong emphasis on the fair treatment of customers who may be vulnerable. In alignment with this, we are a signatory to the Financial Abuse Code and are committed to continuously evolving our approach to identifying, managing and mitigating the risks associated with domestic, economic and financial abuse.

We recognise that these abuses can have profound and lasting impacts on a customer's financial wellbeing and personal safety. Our specialist support teams are trained to manage complex and high-risk cases, including those involving abuse. These teams provide tailored support and ensure that affected customers are treated with sensitivity, discretion and urgency. We prioritise complaints related to domestic, economic and financial abuse for root cause analysis each month, to ensure we have reached satisfactory outcomes and identified opportunities for remediation.

Domestic abuse affects a significant portion of the UK population, with many cases involving financial control or coercion. Research indicates that almost half of individuals in the UK have either experienced, or know someone who has experienced, domestic abuse<sup>16</sup>. There is an estimated £14.4 billion of debt related to economic abuse in the UK<sup>17</sup>, with victim-survivors left with an average individual debt of over £20,000<sup>18</sup>.

Our Nationwide sub-group has implemented a range of measures to support customers at risk of imminent harm. This includes a domestic abuse referral process that enables our specialist support teams to respond in real time to urgent cases. It also includes a dedicated contact form<sup>19</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.

We continue to collaborate with external experts and individuals with lived experience, to inform and enhance our services. This ensures our approach remains trauma-informed, inclusive and responsive to the evolving needs of those affected.

Domestic abuse can lead to, or co-exist with, other forms of exploitation, including forced labour and sexual exploitation, often through mechanisms of isolation, coercion, and economic dependence<sup>20</sup>. As such, our support frameworks for domestic abuse and modern slavery are closely aligned. We advocate for integrated support services that address both issues holistically, ensuring comprehensive care and protection for victims.

### Safe spaces in branches

We have established Safe Spaces in over 430 Nationwide branches to support individuals experiencing domestic abuse or exploitation. These are private, secure rooms where individuals can discreetly access supporting information, contact friends or family, or reach out to specialist organisations, such as Hestia or the police. Branch colleagues have received specialist training to help them recognise the signs of domestic, economic and financial abuse, respond appropriately and sensitively, and provide access to internal specialist support teams and external resources.

### Inclusive banking and survivor support

We recognise the critical role that access to financial services plays in helping vulnerable individuals – including those recovering from modern slavery – to regain control of their lives. Barriers such as lack of identification, financial exclusion and complex debt burdens can significantly hinder recovery and re-integration.

Our support teams have received specialist training and are equipped to assist customers with complex needs, including those arising from exploitation, coercion or financial abuse. This includes understanding the nature of debts incurred under duress, such as loans forced by traffickers or costs associated with their escape and recovery.

Our basic bank accounts, FlexBasic and Virgin Money M account, provide fee-free banking solutions for individuals who may not qualify for standard current accounts. These accounts support financial independence and inclusion.

We continue to review and refine our customer identification controls to strike the right balance between preventing economic crime and enabling access to banking for vulnerable individuals. This includes ensuring compliance with regulatory obligations while maintaining flexibility for those with limited documentation.

Our inclusive banking approach is designed to empower customers, reduce barriers, and promote long-term financial resilience.

<sup>16</sup>Nationwide - UK's biggest branch network - rolls out over 400 Safe Spaces for domestic abuse victims.

<sup>17</sup>Know economic abuse report – 2020.

<sup>18</sup>Statistics on coerced debt - Surviving Economic Abuse.

<sup>19</sup>Domestic and financial abuse contact form | Nationwide.

<sup>20</sup>Evidence of modern slavery.



# Raise awareness

## Colleague training and awareness

All colleagues are required to undertake annual, mandatory e-learning across several topics, including speaking up and whistleblowing, customer vulnerability, anti-bullying and harassment, and economic crime. We review our e-learning modules annually to confirm they align with legislative requirements and market practices, along with internal policy and process changes. This ensures colleagues have the necessary skills and capability to support our customers. Within the Nationwide sub-group, our colleagues have access to training on modern slavery, created by Themis for the finance sector.

As part of our Anti-Slavery week communications, we remind our colleagues, suppliers, subsidiaries, and venture companies of the reality of the issue of modern slavery, and how to spot the signs and report suspicions of modern slavery across our value chain. Our intranet page for Nationwide colleagues provides further information and guidance.

### Economic crime

We provide guidance to colleagues on how to report any suspicions or knowledge of money laundering, terrorist financing, or suspected criminal offences that generate proceeds of crime, such as modern slavery. Any offences involving any perceived customer vulnerability are prioritised.

We provide regular economic crime news and industry updates to our colleagues, including through our Modern Slavery Forum meetings. During the year, we delivered communications aimed at building education and awareness of modern slavery.

## Procurement and supplier management

Colleagues involved in outsourcing and third-party relationship management play a key role in responsible supply chain practices. Responsible Purchasing Principles and online training on how to purchase responsibly is made available within our Nationwide sub-group and we will review opportunities to align training across the Group over the coming year.

In our efforts to ensure a collaborative approach to tackling modern slavery, it is important to share knowledge and understanding with our supplier network. This year we developed an anti-slavery toolkit, in response to a survey we conducted with suppliers within our Nationwide sub-group that indicated a desire for further guidance. We plan to roll this out across the Group over the coming year.



# Measurement and governance

## Our progress and ambitions

	How we have progressed over 2024/25	Our future ambitions
<b>Colleagues</b>	<ul style="list-style-type: none"> <li>Refreshed our Nationwide Code of Conduct to provide greater clarity on human and labour rights, modern slavery, and access to remedy.</li> <li>Launched 'Know your rights' posters and leaflets to promote labour rights among our facilities workforce at Nationwide.</li> <li>Launched a new mental health platform for colleagues within our Nationwide sub-group.</li> </ul>	<ul style="list-style-type: none"> <li><b>Whistleblowing</b> – we will add modern slavery as a reportable category within our whistleblowing process and policy.</li> <li><b>Modern slavery training</b> – we will develop new role-specific training on spotting the signs, and taking action to help.</li> <li><b>Integration of policies and practices</b> across Nationwide and Virgin Money, where appropriate.</li> </ul>
<b>Economic crime</b>	<ul style="list-style-type: none"> <li>Further developed internal threat assessment tools across the Group.</li> <li>Continued to identify and disseminate emerging threat patterns.</li> <li>Collaborated with charities to help us mitigate modern slavery risks.</li> <li>Increased engagement with Public-Private Partnership initiatives.</li> </ul>	<ul style="list-style-type: none"> <li><b>Build awareness</b> – we will continue raising awareness of modern slavery risk and issues, in key business areas.</li> <li><b>Review training and education</b> – we will continue to review our practices and the resources that we make available to support our colleagues.</li> <li><b>Transaction monitoring</b> – we will complete a risk assessment for non-retail business areas within our Nationwide sub-group.</li> </ul>
<b>Supply chain</b>	<ul style="list-style-type: none"> <li>Expanded our risk assessment across the Group, to understand key modern slavery risks across the collective supply chain (page 11).</li> <li>Refreshed responsible purchasing and supplier management training at our Nationwide sub-group, to include more on modern slavery, including high risk sectors, signs of modern slavery, and reporting suspicions.</li> <li>Ran a supplier voice survey for suppliers of Nationwide sub-group, to understand their experience of working with us and to inform opportunities to enhance our responsible purchasing practices (page 12).</li> <li>Reviewed 50 key contracts of our Nationwide sub-group, to understand third parties' commitments to UK real Living Wages; 80% confirmed an existing alignment.</li> </ul>	<ul style="list-style-type: none"> <li><b>Supplier voice survey</b> – we will respond to supplier feedback and re-run our survey in 2026 (see page 12).</li> <li><b>Supplier anti-slavery toolkit</b> – we will launch our toolkit to support suppliers across the Group (see page 15).</li> <li><b>Suppliers' real Living Wage commitments</b> – we are building this commitment into contracts with priority services at our Nationwide sub-group.</li> <li><b>Integration of practices across the Group</b> – we will progress opportunities to integrate practices across the Group, working towards a single, robust approach to labour exploitation and modern slavery.</li> </ul>
<b>Customer vulnerability</b>	<ul style="list-style-type: none"> <li>Enhanced support for customers with disabilities and mental health issues, including those impacted by domestic abuse.</li> <li>Developed and embedded a potentially vulnerable customer dataset within the Nationwide sub-group, which helps us better understand the prevalence of vulnerabilities in our customer base.</li> <li>Launched tools to help customers with communication difficulties (page 13).</li> <li>At our Nationwide sub-group, we launched a new capability to record customers' support needs (page 13) and introduced a domestic abuse referral process and safe call-back process (page 14).</li> <li>Introduced new mandatory training on Consumer Duty and Vulnerability.</li> </ul>	<ul style="list-style-type: none"> <li><b>Mental capacity</b> – we will develop training and awareness content at our Nationwide sub-group, to help colleagues to support customers with a loss of mental capacity.</li> <li>We will expand our range of <b>Easy Read guides</b> on our Nationwide website (page 13) and improve the online information available about branch accessibility.</li> <li>We will launch our <b>Speak Easy</b> communication tool (page 13) to Virgin Money branches.</li> <li>We will continue to improve our support available for people experiencing domestic, economic and financial abuse.</li> </ul>

## Measuring effectiveness

Key performance indicators	2024/25		2023/24	2022/23	2021/22	2020/21
	Nationwide	Virgin Money	Nationwide	Nationwide	Nationwide	Nationwide
Percentage of Procurement colleagues completing tailored training with anti-slavery content	89%	100%	94%	96%	90%	92%
Average overall EcoVadis performance of onboarded third parties (calendar year 2024)	66%	-	63%	59%	58%	-
EcoVadis network average performance (calendar year 2024)	48%	-	46%	45%	44%	-

All colleagues are required to undertake annual, mandatory e-learning across several topics, including speaking up and whistleblowing, economic crime, and anti-bribery and corruption. The levels of completion are monitored and the completion rates meet the minimum levels set by our key performance indicators.

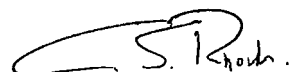
## Governance and statement review

The Board and Group Management Committee have oversight of Nationwide's approach to combatting modern slavery through their annual review and approval of our statement. A cross-functional UK Modern Slavery Act Statement Working Group was formed to produce the statement.

This statement was approved by the Board of Nationwide on 15 July 2025, and by the Boards of Virgin Money and Clydesdale Bank on 23 July 2025, and The Mortgage Works on 8 July 2025.



**Dame Debbie Crosbie DBE**  
(Group Chief Executive Officer)  
for and on behalf of the Board of  
Nationwide



**Chris Rhodes**  
(Virgin Money Chief Executive Officer)  
for and on behalf of the Boards of Virgin  
Money and Clydesdale Bank



**Kevin Parry (Chairman)**  
for and on behalf of the Board of  
Nationwide



**Muir Mathieson**  
(Group Chief Financial Officer)  
for and on behalf of the Board of The  
Mortgage Works