

2017

# Code of Practice

Third Party Code of Practice





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# Code of Practice

## Introduction

As a modern mutual, owned by our members, Nationwide has an inherent duty to be responsible with our members' money; in the products and services we offer, in how we engage with our employees and how we manage our wider social and environmental impact.

Nationwide continually strives to develop and promote high standards of business behaviour and social responsibility. Our Third Party Code of Practice (the 'Code') promotes fairness and dignity for the people and environments where we do business. This includes the products, goods and services provided by our third parties through the supply chain.

It is important to Nationwide that all third parties represent us in a manner that enhances our reputation and relationships with our members, employees and stakeholders.

This Code defines what we expect from our third parties.



## Nationwide's PRIDE values

Nationwide's PRIDE values are how we show our members that we are truly **'On your side'**.

They guide our decision making, our behaviour and are an essential part of our identity that shapes our organisational culture.

Our PRIDE statements are:

- **Putting our members and their money first**
- **Rising to the challenge**
- **Inspiring trust**
- **Doing the right thing in the right way**
- **Excelling at relationships**



## Member outcomes

A key aspect of Nationwide's approach to business is to put our members at the heart of everything we do. Nationwide does this by ensuring we identify and mitigate risks to our members and that we, and third parties acting on our behalf, act with integrity in the markets we operate in.

Nationwide utilises an internal framework to help us consider the ultimate member outcome and our impact in the markets in all decision-making, ensuring that we:

- create and nurture fair member relationships
- meet the needs of our members and do what we say
- rebalance unfair outcomes when these are created, and
- protect our members, their data, and the markets we operate in.

Ensuring the right outcome for our members is vital to Nationwide and therefore should be a key consideration for any third parties working with us.

## Roles and responsibilities

Nationwide is committed to act in a fair and ethical manner and will comply with all applicable laws, regulations and internal policies. Nationwide values the contribution of its third parties in being able to deliver products and services to our members. Nationwide will:

- provide guidance and training to our staff to ensure that they are familiar with our own ethical and compliance policies and treat our third parties in accordance with the policies
- provide clear guidance about our payment processes ensuring we pay our third parties promptly, and we encourage our third parties to ensure they act in the same manner within their supply chain

- communicate the requirements of our Code and related policies to our third parties on an ongoing basis
- report on how this Code is being implemented and adopted by third parties.

Third parties are expected to comply with the requirements of this Code, and to raise any concerns or issues with its implementation to Nationwide.

The requirements of this Code should be explained to employees and included within operating practices.

Third parties are required to confirm agreement to comply with this Code. Third parties must inform Nationwide of any changes that will impact their ability to comply with this Code.

**Nationwide expects all third parties to:**

- make this Code available to all employees engaged on Nationwide business
- respect and act in a manner that is consistent with Nationwide's PRIDE values and supports our Customer outcomes
- act responsibly and ethically with all stakeholders, including Nationwide's members, their own and Nationwide employees, other third parties engaged by Nationwide and their own supply chain
- inform Nationwide of any actions or issues that may contravene this Code of Practice.



### **THE CODE**

Nationwide Building Society expects all its third parties to conduct its business in a fair and ethical way and where appropriate, for the size of business and nature of the service being provided, to have policies, statements or principles on ethical working and corporate responsibility that are communicated to both employees and the supply chain.

The policies, statements or principles will be underpinned by processes and systems to enable monitoring and reporting which are appropriate to the products and services provided.

## 1. Human Rights

Nationwide respects and values the human rights of individuals of all those people living in the markets and communities where it operates, adhering to laws and regulations of every country where it does business. Nationwide conforms with the United Nations Declaration of Human Rights, the International Labour Organisation (ILO) Foundation Conventions and are a Principal Partner of the Living Wage Foundation.

Nationwide expects all of its third parties to respect the human rights of their employees, and the employees of its supply chain, and to comply with the relevant legislation and regulations in the countries and communities in which they operate. These are the minimum standards we expect.

- Third parties will prohibit the use of forced or involuntary labour, through slavery, servitude, forced or compulsory labour, human trafficking or other means. Employment is voluntary and employees retain the right and are able to leave employment when they want.
- Third parties will not use child labour. Employment of young workers shall adhere to local regulations.
- Third parties will ensure that working hours are in accordance with local regulation and industry practices, that employees are allowed at least one day off in each working week and all overtime is carried out on a voluntary basis.
- Third parties will comply with all applicable wage legislation and regulation relevant to the country in which they operate, including those relating to minimum wages, overtime hours and any other elements of compensation. Unauthorised deductions will not be taken from wages.
- Third parties will respect the legal rights of employees to join, or to refrain from joining, worker organisations and associations including trade unions.
- Third parties will not discriminate on grounds of race, religion or belief, age, sexual orientation, sex, gender reassignment, marital or civil partnership status, pregnancy and maternity or disability in its employment practices.
- Third parties will treat all employees with respect and shall not use any form of psychological or physical coercion or harassment.
- Third parties will provide clear disciplinary and grievance procedures that enable employees to raise concerns including bullying and harassment, mental, physical or verbal abuse.

## 2. Health and Safety

Nationwide is committed to providing a positive working environment which supports the health and safety of our employees, members, third parties and anyone who visits our premises.

As a minimum, we expect third parties to:

- provide a safe environment for all employees and visitors, by complying with all local health and safety laws and regulations
- work with Nationwide to reduce or eliminate risks to employees' health and well-being at work in order to provide a safe working environment.

### 3. Environment

Nationwide are focussed on reducing our environmental impact and managing our operations as efficiently as possible. Our main environmental impacts come from our use of energy, water, business travel and waste. Nationwide has achieved the Carbon Trust Triple Standard accreditation for the management and reduction of operational carbon emissions waste and water.

More information on Nationwide's environmental activities can be found at **Inside Your Society – Your Nationwide**

We expect our third parties to support our goals and as a minimum:

- comply with all applicable environmental laws, regulations and standards, including emissions reporting
- minimise the use of dangerous and hazardous materials, maintaining appropriate safety records where applicable.

We also encourage our third parties to:

- develop and implement a written environmental policy or statement which seeks to maximise efficient usage of energy, water and resources and minimise CO2 emissions, pollution and waste.

## 4. Ethics

Nationwide expects all third parties working with us to conduct their business, and manage their supply chain, in an ethical manner, and to support our member outcomes as detailed earlier in this Code. We expect our third parties to promote anti-bribery and anti-corruption, adopting a Code of Practice, policy or statements, and appropriate systems and controls that encompasses:

- adherence to local laws and regulations
- ethics and acting with integrity, covering: fraud, bribery and corruption, conflicts of interest, gifts and hospitality, data protection (i.e. General Data Protection Regulation (GDPR) and intellectual property.