



Principles for *Responsible Banking*

Reporting and Self-Assessment
June 2023



Principles for
Responsible Banking



Introduction

Nationwide Building Society became a signatory of the United Nations Environment Programme Finance Initiative (UNEP FI) Principles for Responsible Banking (“the Principles”) in April 2021. We are one of over 320 financial services organisations across the world that are currently signed up to the Principles. This is our second report on our progress towards implementing the Principles, using the reporting and self-assessment template provided by the UNEP FI.

Key features of the Principles



Comprehensive framework addressing the strategic, portfolio and transaction level processes across all of the Society's business areas



Alignment with the UN Sustainable Development Goals and the Paris Climate Agreement



Target-setting in the areas of most significant positive and negative impact



Transparency and accountability through public reporting and review



Guidance, expert advice and peer learning to support implementation



The six Principles for Responsible Banking



Principle 1: *Alignment*

We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.



Principle 2: *Impact and target setting*

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.



Principle 3: *Clients and customers*

We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.



Principle 4: *Stakeholders*

We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.



Principle 5: *Governance and culture*

We will implement our commitment to these Principles through effective governance and a culture of responsible banking.



Principle 6: *Transparency and accountability*

We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.

Principle 1: *Alignment*

 **We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.**

1.1. Business model

Describe (high-level) your organisation's business model, including the main customer segments served, types of products and services provided, the main sectors and types of activities across the main geographies in which your organisation operates or provides products and services. Please also quantify the information by disclosing e.g. the distribution of your organisation's portfolio (%) in terms of geographies, segments (i.e. by balance sheet and/or off-balance sheet) or by disclosing the number of customers and clients served.

We are a UK-based building society, owned by our members (our customers who have their current account, mortgage or savings with us). As a member-owned modern mutual, with a national branch network, Nationwide holds a unique position in UK financial services. We can deliver the value, service and mutual good to our customers and members that others cannot - making a positive difference to our customers and members, our communities and society as a whole.

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 have four strategic drivers that help us to deliver more rewarding relationships and simply brilliant service, and to continuously improve and become a beacon for mutual good.

As a building society, we focus on providing banking products and services for our customers. We are the world's largest building society with over 17 million customers, 16 million of whom are members. We are the UK's second largest mortgage provider and look after almost £1 in every £10 saved in the UK. We hold one in ten of the UK's current accounts¹ and we also support landlords and those who rely on the private rented sector for their long-term housing needs through our buy to let mortgage business, The Mortgage Works. This diversifies our income, and helps us give value back to our customers, through better product pricing and service. In addition, we offer a comprehensive range of wider retail financial services and products, including credit cards, personal loans and insurance.

Our mutual ownership model means we think about profit in a different way from our banking peers. We do not have to pursue profits to pay shareholders dividends. Instead, we balance our need to retain sufficient profit to remain financially strong, with rewarding members and our commitment to share our success through:

- delivering value in banking and rewarding loyalty
- providing brilliant and trusted service
- product and service propositions that meet the needs and expectations of existing and future customers
- committing at least 1% of our pre-tax profits² each year to charitable activities, as voted for by our members in 2007

Annual report and accounts:

[Our difference is our mutual ownership model, pages 6-8;](#)
[Our Blueprint for a modern mutual, pages 26-28](#)

Website: [About us](#)

¹CACI's Current Account and Savings Database, Stock (February 2023).

²The 1% is calculated based on average pre-tax profits over the previous three years.



Principle 1: *Alignment*

1.2. Strategy alignment

Does your corporate strategy identify and reflect sustainability as strategic priority/ies for your organisation?

- Yes
 No

Does your organisation also reference any of the following frameworks or sustainability regulatory reporting requirements in its strategic priorities or policies to implement these?

- UN Guiding Principles on Business and Human Rights
 International Labour Organization fundamental conventions
 UN Global Compact
 UN Declaration on the Rights of Indigenous Peoples
 Any applicable regulatory reporting requirements on environmental risk assessments, e.g. on climate risk - please specify which ones: Task Force on Climate-related Financial Disclosures (TCFD)
 Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery - please specify which ones: UK Modern Slavery Act (2015)
 None of the above

Please describe how your organisation has aligned and/or is planning to align its strategy to be consistent with the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.

We want to be a beacon for mutual good, and have a meaningful impact across society. Being a responsible business is part of our mutual heritage, and we strive to do business in a way that positively impacts our customers, employees and communities. As a signatory to the UNEP FI Principles for Responsible Banking, we are committed to a strategic alignment with the 2015 Paris Climate Agreement and to the UN Sustainable Development Goals (SDGs). It is also our aspiration to support the UK in achieving its ambition of a net-zero carbon emissions future by 2050. We joined the Net-Zero Banking Alliance (NZBA) and Glasgow Financial Alliance for Net Zero (GFANZ) in 2021 in support of this.

Our business model means that our strategy does not involve lending to, or investing in, the fossil fuel industry. We are progressing five Mutual Good Commitments, that support our ambitions and demonstrate how our business aligns to the UN SDGs. They are focused in areas where we believe we can make the most positive difference. They are:

- Help to achieve safe and secure homes for all (SDGs 1, 8, 10, 11)
- Protect our customers' financial wellbeing (SDG 1)
- Support progress towards a greener society (SDGs 7, 11, 12, 13)
- Champion thriving communities (SDGs 8, 11)
- Reflect the diversity of our society (SDGs 5, 8, 10)

More information on the targets that underpin our Mutual Good Commitments can be found on pages 11-13. Our science-based targets, that support our membership of the NZBA and GFANZ (as well as our Mutual Good Commitment to support progress towards a greener society), can be found in our intermediate net-zero ambitions 2022: Basis of preparation disclosure.

Annual report and accounts: [Our Mutual Good Commitments, pages 46-51](#)

Intermediate net-zero ambitions 2022: Basis of preparation: [Intermediate science-based targets, pages 5-7](#)

Climate-related financial disclosures: [Strategy, pages 7-16](#)

Principle 2: *Impact and target setting*

 **We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.**

2.1. Impact analysis (Key Step 1)

Show that your organisation has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly and fulfil the following requirements/elements (a-d):

a) Scope: What is the scope of your organisation's impact analysis? Please describe which parts of the organisation's core business areas, products/services across the main geographies that the organisation operates in (as described under 1.1) have been considered in the impact analysis. Please also describe which areas have not yet been included, and why.

We are a UK building society focused on providing banking products and services for our 17 million customers. Our core products are current accounts, mortgages and savings. We have the second largest single-brand branch network across the UK financial services sector. We also support the private rented sector through our buy to let mortgage business, The Mortgage Works.

Over the year, we have continued to advance our understanding of the areas where we can have the most significant potential impact, based on our scope and expertise, as well as our measurement capabilities. In 2022, we used the UNEP FI Impact Analysis Tools (Context and Consumer Banking modules) to consider these impact areas and priorities further, across our portfolio.

Annual report and accounts:
[Our difference is our mutual ownership model, pages 6-8](#)

b) Portfolio composition: Has your organisation considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition of your portfolio globally and per geographical scope

- i) by sectors & industries for business, corporate and investment banking portfolios (i.e. sector exposure or industry breakdown in %), and/or
- ii) by products & services and by types of customers for consumer and retail banking portfolios.

If your organisation has taken another approach to determine the organisation's scale of exposure, please elaborate, to show how you have considered where the organisation's core business/major activities lie in terms of industries or sectors.

We have considered the composition of our portfolio in our analysis. Around 75% of our funding comes from our customers, and over 95% of our lending is secured on UK residential property¹. Of our overall loans and advances to customers, 75% is in residential mortgages, 21% in buy to let mortgages, 2% in consumer banking (personal loans and credit cards), and 3% in commercial and other lending (including small, closed commercial real estate and private finance initiative portfolios, and lending to registered social landlords).

Whilst we partner with organisations and suppliers in other countries, our core business operates in UK retail banking as described above, and the scope of our impact analysis therefore only covers the UK.

Annual report and accounts:
[Our difference is our mutual ownership model, pages 6-8;](#)
[Financial review, page 69](#)

¹The Building Societies Act requires that at least 75% of our lending is secured on residential property and at least 50% of our funding comes from customers. For more detail, see page 319 of our Annual report and accounts.



Principle 2: *Impact and target setting*

2.1. Impact analysis (Key Step 1)

Show that your organisation has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly and fulfil the following requirements/elements (a-d):

c) Context: What are the main challenges and priorities related to sustainable development in the main countries/regions in which your organisation and/or your clients operate? Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis.

Through the Context module of the UNEP FI Impact Analysis Tools, the main priorities identified for the UK were to improve the availability, accessibility, affordability and quality of resources and services, both in terms of housing and finance. Climate stability, and gender and ethnic equality were also key challenges for the UK. These issues all align with research and feedback from our stakeholders, and have shaped our five Mutual Good Commitments.

Finance: We engage directly with our members via our Annual General Meeting (AGM) and TalkBacks, as well as our online Member Connect platform, on a broad range of subjects each year. Key areas of discussion this year included the cost of living crisis, protection from fraud and scams, and maintaining access to branches and to cash. We also engaged with Members of Parliament (MPs) and regulators on these issues. As part of this, we invited MPs to visit branches, to connect with policy makers on these matters at a local level.

Housing: Our Affordability Report in January 2023 showed that higher mortgage rates had resulted in a significant increase in the cost of servicing a mortgage relative to take-home pay. High house prices relative to average earnings continue to make raising a deposit a significant barrier for first time buyers and affordability more generally remains most stretched in London and the south of England. We have engaged with first time buyers to discuss the challenges they face first-hand, and we have also engaged with mortgage intermediaries and MPs on this subject. In addition, we engaged directly with MPs on the matters of cladding and mortgage lending, support for mortgage holders through the cost of living crisis, reform of the private rented sector and investment in social housing.

Climate: We are committed to a net-zero future, and it is our aspiration to support the UK in achieving its ambition to be net-zero by 2050. We aim to support progress towards a greener society through reducing the emissions of our business operations and supply chain and aiming to support our customers in reducing their carbon emissions through our green finance propositions and engagement. With housing accounting for around 16% of the UK's total carbon emissions¹, and as the UK's second largest mortgage provider, supporting our customers in greening their homes is a key way for us to reduce our impact on the environment. Our Green Homes Action Group, a group of cross-sector organisations and leaders with a shared interest in promoting high-quality, affordable retrofit, is campaigning to the Government for a National Retrofit Strategy to support the greening of UK homes. In addition, our participation in scenario analysis, including the PRA's Climate Biennial Exploratory Scenario (CBES) exercise, has helped us better understand our potential exposures to the financial risks arising from climate change and the results are being used to inform our strategic decision making.

Diversity: In the UK financial services industry, pay gap reporting shows that that men are paid an average of 30.8% (median of 36.6%) more than women². As well as publishing our gender pay gap each year, we are one of the few organisations to voluntarily publish our ethnicity pay gap (and we are lobbying for mandatory reporting of ethnicity pay gaps across all firms).

Annual report and accounts: [Engaging with our stakeholders, pages 29-35](#)

House Price Index: [Affordability Report, January 2023](#)

Climate-related financial disclosures: [Strategy, pages 7-16](#)

Website: [Pay gaps at Nationwide](#)

¹ 2021 UK Greenhouse Gas Emissions, Final Figures (publishing.service.gov.uk).

² Office for National Statistics: Gender Pay Gap 2022 Provisional Dataset (Industry: Financial service activities, except insurance and pension funding), 26 October 2022 (ons.gov.uk).



Principle 2: *Impact and target setting*

2.1. Impact analysis (Key Step 1)

Based on these first three elements of an impact analysis, what positive and negative impact areas has your organisation identified? Which (at least two) significant impact areas did you prioritise to pursue your target setting strategy (see 2.2)? Please disclose.

We identified the following as significant impact areas for us to support:

- **Finance:** We seek to continue to offer high quality products and services, accessible through a broad range of channels, including through our branch network. Maintaining a strong branch presence means we can be there for our customers when they prefer to speak to us face to face. We also recognise the importance of protecting our customers' financial wellbeing, including protecting them from economic crime, supporting them with financial education to help them more confidently manage their money, and providing specialist support for our customers in vulnerable circumstances.
- **Housing:** We have an opportunity to improve housing accessibility and affordability, particularly for first time buyers. We are also in a position to guide improvements to the quality of private rented accommodation and support for social housing. We can also influence positive change in the housing system through our partnerships with Shelter and The Nationwide Foundation¹, who tackle homelessness and help people into homes that are decent and affordable, respectively.
- **Climate:** We are committed to working towards a net-zero future. We are already carbon neutral² for all energy use and emissions for our internal operations and have an opportunity to support our customers in greening their homes. However we recognise the significant challenges, particularly with regards to greening UK homes, and acknowledge that achieving the reduction in emissions to deliver net-zero will not be possible without large-scale government action and significant cross-industry collaborative effort.
- **Diversity:** Being inclusive supports our mutual purpose and drives our success in serving our customers. We want our Society to reflect the diversity of the communities we serve, as a diverse range of backgrounds, 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 them.

¹The Nationwide Foundation

²We achieved carbon neutrality by a combination of eliminating our emissions and funding equivalent carbon savings through renewable or offsetting projects.



Principle 2: *Impact and target setting*

2.1. Impact analysis (Key Step 1)

Show that your organisation has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly and fulfil the following requirements/elements (a-d):

d) For these (min. two prioritised impact areas): Performance measurement: Has your organisation identified which sectors & industries as well as types of customers financed or invested in are causing the strongest actual positive or negative impacts? Please describe how you assessed the performance of these, using appropriate indicators related to significant impact areas that apply to your organisation's context.

In determining priority areas for target-setting among its areas of most significant impact, you should consider the organisation's current performance levels, i.e. qualitative and/or quantitative indicators and/or proxies of the social, economic and environmental impacts resulting from the organisation's activities and provision of products and services. If you have identified climate and/or financial health & inclusion as your most significant impact areas, please also refer to the applicable indicators in the Annex.

If your organisation has taken another approach to assess the intensity of impact resulting from the organisation's activities and provision of products and services, please describe this.

In determining priority areas for target-setting, we evaluated the progress towards our five Mutual Good Commitments, as detailed in section 2.2, to assess our current performance. We also carried out a broader review of the targets underlying our Mutual Good Commitments, factoring in our impact assessment, and the changing social and macroeconomic environment, to develop a set of more relevant and impactful targets that align with our refreshed strategy.

Finance: Supporting our customers through the cost of living crisis has been, and will remain, a priority. We have sought to support our customers in a number of ways, as detailed on page 17 of our Annual Report and Accounts. We also understand the importance of our branches to our customers, particularly in the wider context of the rapidly declining number of branches in the UK's retail banking network. Our Branch Promise, as described on 13 of this report, supports our intentions to be there for our customers who rely on our branches, or prefer to speak to us face to face. We continue to do all we can to protect our customers from scams and, in 2021, we launched a Scam Checker Service, as described on page 12, and set a target against which we will measure our success in supporting our customers.

Housing: We continue to focus on supporting first time buyers into homes of their own, and the provision of decent homes for all. This includes support for our customers in rented accommodation, and supporting the social housing sector too. We have set measures to assess our progress against our ambitions, as described on page 11. In addition, we continue to commit at least 1% of our pre-tax profit to charitable activities every year, largely focused on housing. This is split between our own social investment programmes, including funding our long-term partnership with Shelter, the Nationwide Foundation and the internal costs of managing social investment activities.

Climate: We have calculated the reductions necessary in our scope 1, 2 and 3 emissions in order to achieve our intermediate (by 2030) science-based targets. These reductions were determined in accordance with the methodologies of the Science Based Targets initiative (SBTi). However, as described on page 12, we recognise the significant challenges, particularly with regards to greening UK homes, and acknowledge that achieving the reduction in emissions to deliver net-zero will not be possible without large-scale government action and significant cross-industry collaborative effort.

Diversity: We are reviewing our longer-term diversity measures in light of latest census data, in order to make sure our measures reflect the diversity of UK society. Our focus on social mobility will support our progress. In 2022, we partnered with Progress Together, a membership body centred on progression, retention and socio-economic diversity in financial services. With their support and input, we began to gather voluntary socio-economic data from our colleagues in January 2023. This will enable us to benchmark our socio-economic diversity against our peers and inform our future inclusion, diversity and wellbeing priorities.

Annual report and accounts: [Our Blueprint for a modern mutual, pages 26-28](#); [Beacon for mutual good, pages 19-20](#); [Our Mutual Good Commitments, pages 46-51](#)

Intermediate net-zero ambitions 2022: Basis of preparation: [pages 2-7](#)

Principle 2: *Impact and target setting*

2.1. Impact analysis (Key Step 1) – Self-assessment summary

Which of the following components of impact analysis has your organisation completed, in order to identify the areas in which your organisation has its most significant (potential) positive and negative impacts?

Scope:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Portfolio composition:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Context:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Performance measurement:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No

Which most significant impact areas have you identified for your organisation, as a result of the impact analysis?

Finance (availability, accessibility, affordability and quality of financial products and services);

Housing (availability, accessibility, affordability and quality of housing);

Climate (climate stability)

Diversity (gender, ethnic, disability and sexual orientation diversity)

How recent is the data used for and disclosed in the impact analysis?

- Up to 6 months prior to publication
- Up to 12 months prior to publication
- Up to 18 months prior to publication
- Longer than 18 months prior to publication

Open text field to describe potential challenges, aspects not covered by the above etc.: (optional)

Principle 2: *Impact and target setting*

2.2. Target setting (Key Step 2)

Show that your organisation has set and published a minimum of two targets which address at least two different areas of most significant impact that you identified in your impact analysis.

The targets have to be Specific, Measurable (qualitative or quantitative), Achievable, Relevant and Time-bound (SMART). Please disclose the following elements of target setting (a-d), for each target separately:

- a) Alignment:** which international, regional or national policy frameworks to align your organisation's portfolio with have you identified as relevant? Show that the selected indicators and targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks.
- b) Baseline:** Have you determined a baseline for selected indicators and assessed the current level of alignment? Please disclose the indicators used as well as the year of the baseline.
In case you have identified other and/or additional indicators as relevant to determine the baseline and assess the level of alignment towards impact driven targets, please disclose these.
- a) SMART targets (incl. key performance indicators (KPIs)):** Please disclose the targets for your first and your second area of most significant impact, if already in place (as well as further impact areas, if in place). Which KPIs are you using to monitor progress towards reaching the target? Please disclose.
- b) d) Action plan:** Which actions including milestones have you defined to meet the set targets? Please describe.

Please also show that your organisation has analysed and acknowledged significant (potential) indirect impacts of the set targets within the impact area or on other impact areas and that it has set out relevant actions to avoid, mitigate, or compensate potential negative impacts.

Following our impact analysis, we have further developed and updated our targets in areas where we believe we can make the most significant, positive impacts. Our targets are framed around our five Mutual Good Commitments, that support our broader strategy and align with the UN Sustainable Development Goals (SDGs) and 2015 Paris Climate Agreement. They also support our membership of the Net-Zero Banking Alliance (NZBA) and Glasgow Alliance for Net Zero (GFANZ), in which we have committed to playing our part in supporting the UK's transition to a net-zero economy. We will continue to assess the areas where we can make the most difference, and progress our strategy accordingly. Our Mutual Good Commitments and supporting targets are set out below, alongside the SDGs they most closely align to.

Help to achieve safe and secure homes for all (Housing)

SDG 1 – No Poverty; SDG 8 – Decent Work and Economic Growth; SDG 10 – Reduced Inequalities; SDG 11 – Sustainable Cities and Communities

- By 2025, we will help 250,000 customers to buy their first home (set against a baseline of November 2020)
- We will ensure 100% of our new buy to let lending on rental properties continues to meet the Decent Homes Standard
- By 2025, we will have provided £1 billion of new lending to support the social housing sector (set against a baseline of March 2022)

We are supporting first time buyers into homes through addressing the two main challenges they face, of raising a deposit and being able to borrow enough to afford a property. Our Helping Hand mortgage has successfully supported affordability, enabling first time buyers to borrow more (up to 5.5 times their salary). It is also extends to 95% loan to value, reducing the pressure of saving for a larger deposit. We recognise that many of our customers are in rented accommodation, and our approach to lending ensures that the buy to let homes we lend on are compliant with, or exceed, the Decent Homes Standard recommendations, so that tenants can live in safe and secure homes. We also support those in more vulnerable housing situations by lending to support the social housing sector.

Annual report and accounts: [Our Mutual Good Commitments, pages 46-51](#)

Climate-related financial disclosures: [Strategy, pages 7-16; Metrics and targets, pages 27-47](#)

Intermediate net-zero ambitions 2022: Basis of preparation: [Intermediate science-based targets, pages 5-7; Actions, pages 8-19](#)

[Social Investment impact report](#)



Principle 2: *Impact and target setting*

2.2. Target setting (Key Step 2) (continued)

Protect our customers' financial wellbeing (Finance)

- SDG 1 – No Poverty

By 2025, we will protect 750,000 customers with our Scam Checker Service (set against a baseline of March 2022)

We continue to do all we can to protect our customers from fraud. Last year, our fraud defence systems and specialist fraud team together helped prevent £115 million (2022: £97 million) of attempted fraud on card and online transactions. In addition to this, our Scam Checker Service, underpinned by our Scam Protection Promise, enables our customers to check their payments with us, before they make them, if they have concerns. Our Promise means that, if after checks and a scam conversation, the payment does not appear suspicious but later turns out to be a scam, we promise to refund our customers every penny.

Support progress towards a greener society (Climate)

SDG 7 – Affordable and Clean Energy; SDG 11 – Sustainable Cities and Communities; SDG 12 – Responsible Consumption and Production; SDG 13 – Climate Action

- 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, and remain carbon neutral for these emissions (set against a baseline of 4 April 2022)
- We aim to continue to source 100% renewable electricity for our own operations, in line with our 2030 scope 2 science-based target (set against a baseline of 4 April 2022)
- We will aim to reduce our scope 3 emissions for our mortgages, other secured lending activity, and our supply chain, by taking steps to reduce those emissions within our control and encouraging our customers, borrowers and suppliers to do the same, in line with our 2030 scope 3 science-based target (set against a baseline of 31 December 2021)

In December 2022, Nationwide published its intermediate (by 2030) science-based targets, and our targets above reflect these. Our science-based targets have been set in accordance with the methodologies of the Science Based Targets initiative (SBTi), which provides methodologies for companies to set intermediate greenhouse gas reduction targets.

We are already making good progress in reducing the emissions of our own operations. Since 2018, all our electricity has been supplied from renewable sources, and we have remained carbon neutral¹ for all energy use and our internal business operations since 2020. As at the end of 2022, we had removed the use of gas from over 75% of our branch network and we are on track to remove 100% of gas from our branches by 2030, replacing it with electrical solutions. For our scope 3 emissions, we have built climate change considerations into our third-party processes and offer a range of green propositions and initiatives to support our customers in greening their homes. However, we consider it highly unlikely at present, that our targets for scope 3 investments emissions can be achieved under current government policies in connection with the UK's housing stock. Emissions associated with our residential mortgage lending account for the majority (more than 80%) of our total scope 3 emissions and we have very limited control over practical measures to reduce the emissions from properties which are owned by our borrowers.

¹We achieved carbon neutrality by a combination of eliminating our emissions and funding equivalent carbon savings through renewable or offsetting projects.



Principle 2: *Impact and target setting*

2.2. Target setting (Key Step 2) (continued)

Champion thriving communities (Finance and Housing)

SDG 8 – Decent Work and Economic Growth; SDG 11 – Sustainable Cities and Communities

- Our Branch Promise: Every town and city which has a branch today will still have one until at least 2024
- We will commit at least 1% of our pre-tax profits¹ to charitable activities each year

We have the second largest single-brand branch network across the UK financial services sector and, at the 2023 Moneyfacts Consumer Awards, we won the Branch Network of the Year award. In addition, as voted for by our members in 2007, we continue to commit at least 1% of our pre-tax profits¹ each year to charitable activities, largely focused on housing. More information on how this money is split can be found on pages 19-20 of our Annual Report and Accounts, and more on the positive impacts this has had across our communities can be found in our Social Investment impact report.

Reflect the diversity of our society (Diversity)

SDG 5 – Gender Equality; SDG 8 – Decent Work and Economic Growth; SDG 10 – Reduced Inequalities

- By 2028, our people will reflect the wider society that we represent. This includes seven measures that span across gender, ethnicity, disability and sexual orientation

Our flexible hybrid working commitments are helping us attract and retain the diverse talent we need. Our focus on social mobility since 2022 will also support our progress. Our eleven employee networks celebrate diversity with events that help raise awareness and promote allyship (last year this included Asian Experience Month, Black History Month, Pride Month and International Women's Day). They also help our colleagues build support networks and drive positive changes. For example, they introduced trained workplace menopause coaches and built special educational needs (SEN) inclusion into our volunteering work on Money Lessons in schools. Our employee networks have won a range of accolades, as referenced on page 32 of our Annual Report and Accounts. In the 2023 Financial Times' Diversity Leaders list², which surveys more than 100,000 employees on their perceptions of organisations' inclusivity and efforts to promote diversity, we were the highest-ranked UK high street financial services provider for the second year running. We were also awarded Gold Employer standard by Stonewall for our work on LGBTQ+ inclusion.

Progressing our five Mutual Good Commitments: We continue to launch initiatives and work collaboratively across industry, and with the Government, where relevant, in order to make progress towards achieving our targets. We track our performance towards our targets and publicly report on our progress in our Annual Report and Accounts. We also share our progress with the Board on a quarterly basis in the Business Performance Pack.

We remain conscious of the potential negative impacts of our set targets. As we work towards our ambition to support progress towards a greener society, we will seek to ensure a just transition (as members of the Financing a Just Transition Alliance), by making sure the most vulnerable in society are not disadvantaged as we transition to a net-zero economy. For this reason, we do not intend to negatively select against less energy efficient mortgage properties, but we acknowledge this may impact our ability to achieve our science-based target. We will continue to engage and influence policymakers, including through our Green Homes Action Group, to encourage the development of green policies which support wider society in making the changes needed to achieve a just transition to net-zero.

We also recognise that not everyone can afford to own a home of their own, but we believe that everyone deserves to have a place fit to call home. We have therefore included a target to support renters in having good quality homes, and enabling social housing solutions for those in vulnerable housing situations.

¹The 1% is calculated based on average pre-tax profits over the previous three years.

²The Financial Times-Statista ranking of Europe's Diversity Leaders 2023, based on independent surveys of more than 100,000 employees across Europe on their perceptions of their organisations' diversity and inclusion practices.

Principle 2: *Impact and target setting*

2.2. Target setting (Key Step 2) – Self-assessment summary

Which of the following components of target setting in line with the PRB requirements has your organisation completed or is currently in a process of assessing for your...

	...first area of most significant impact (Finance)			...second area of most significant impact (Housing)		
Alignment:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Baseline:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
SMART targets:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Action plan:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
	...third area of most significant impact (Climate)			...fourth area of most significant impact (Diversity)		
Alignment:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Baseline:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
SMART targets:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Action plan:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No

Principle 2: *Impact and target setting*

2.3. Target implementation and monitoring (Key Step 2)

For each target separately:

Show that your organisation has implemented the actions it had previously defined to meet the set target.

Report on your organisation's progress since the last report towards achieving each of the set targets and the impact your progress resulted in, using the indicators and KPIs to monitor progress you have defined under 2.2.

Or, in case of changes to implementation plans (relevant for 2nd and subsequent reports only): Describe the potential changes (changes to priority impact areas, changes to indicators, acceleration/review of targets, introduction of new milestones or revisions of action plans) and explain why those changes have become necessary.

We continue to progress initiatives to support us in achieving our targets, and we report on our progress towards our Mutual Good Commitment targets on pages 47-51 of our Annual Report and Accounts. Our performance towards our targets is monitored by the Responsible Business Committee (RBC), and is overseen by the Executive Committee (ExCo) and the Board. Details on governance responsibilities can be found on page 23 of this report.

In 2022, Nationwide's Board approved our new strategy, which is centred around our purpose: *Banking – but fairer, more rewarding, and for the good of society*. More detail on our strategy, and four strategic drivers, can be found on pages 26-28 of our Annual Report and Accounts. Under our new strategy, we have reviewed and, where appropriate, updated the underlying measures that support our Mutual Good Commitments, so that they remain closely aligned to our strategic priorities. Our updated measures are presented on pages 11-13 of this report. Where there have been changes to measures, these are noted in the table below.

Help to achieve safe and secure homes for all

Mutual Good Commitment measure	Status	Rationale for change in status
We will ensure 100% of our new buy to let lending on rental properties continues to meet the Decent Homes Standard	New	Over a fifth of the 4.4 million households that rent privately in Britain endure the poor conditions associated with substandard housing ¹ . Our new measure replaces our landlord measure below, as it is a more impactful and strategic measure that demonstrates better our support for renters.
By 2025 we will have provided £1 billion of new lending to support the social housing sector	New	Our partner charity, Shelter, is calling on the government to build at least 90,000 social homes a year, to ensure everyone has a safe place to call home ² . Our new measure demonstrates our support for the social housing sector, benefiting those in vulnerable housing situations.
By 2025, we will equip 50,000 landlords with tools to improve tenants' lives	Retired	We are reviewing our landlord strategy and at this time are not seeking to acquire new users to the tool. Our new renter measure above is a more impactful and strategic measure.
By 2025, we will help 25,000 customers use the money built up in their home to live a better retirement	Retired	Over the year, we have taken steps to protect customers over 55 years old from the risks of equity release borrowing in an environment where rates are elevated and there are signs of downward pressure on house prices, as these could lead to equity erosion. This measure is therefore no longer appropriate.

Annual report and accounts: [Our Mutual Good Commitments, pages 46-51](#); [Our Blueprint for a modern mutual, pages 26-28](#)

Climate-related financial disclosures: [Metrics and targets, pages 27-47](#)

Intermediate net-zero ambitions 2022: Basis of preparation: [Intermediate science-based targets, pages 5-7](#)

¹ A Decent Homes Standard in the private rented sector: consultation - GOV.UK (www.gov.uk).

² Let's build a better future: Call on the government to build social housing | Campaigns - Shelter England

Principle 2: *Impact and target setting*

2.3. Target implementation and monitoring (Key Step 2) (continued)

Under our new strategy, we have reviewed and, where appropriate, updated the underlying measures that support our Mutual Good Commitments, so that they remain closely aligned to our strategic priorities. Our updated measures are presented on pages 11-13 of this report. Where there have been changes, these are noted in the tables below.

Protect our customers' financial wellbeing

Mutual Good Commitment measure	Status	Rationale for change in status
By 2025, we will protect 750,000 customers with our Scam Checker Service	New	Our measure demonstrates our commitment to protecting our customers from fraud, and to providing support and reassurance to our customers concerned about potential scams.
By 2025, we will support 200,000 financially squeezed and struggling customers to become regular savers	Retired	This measure is no longer appropriate in the current macroeconomic environment, where cost of living challenges make it more difficult for these customers to save. We are supporting our customers through the cost of living crisis; more information can be found on page 17 of our Annual Report and Accounts. It is still important to us that we are there to support these customers to save when they can, and we do so through initiatives such as our Start to Save Issue 2 account, and Banking app features including our Impulse Saver, Round-Ups and Savings Goals tools.

Support progress towards a greener society

Mutual Good Commitment measure	Status	Rationale for change in status
Our scope 1, 2 and 3 measures are as reported on page 12 of this report	New	Our new measures reflect our intermediate (by 2030) science-based targets, which we published in December 2022. More information on these can be found in our Intermediate net-zero ambitions 2022: Basis of preparation report.
By 2030, at least 50% of the homes in our mortgage book will be rated EPC C or above	Retired	Our new 2030 scope 3 science-based target for mortgages will replace our EPC target as it aligns fully with our net-zero ambition.
By 2030, our business operations and supply chain will be carbon neutral	Retired	Our new 2030 scope 1 and 2 science-based targets reflect our net-zero ambition for our business operations and are more ambitious than our carbon neutral measure. Our ambition to reduce the emissions of our supply chain is included within our new 2030 scope 3 science-based target.

Principle 3: *Clients and customers*



We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

3.1. Client engagement

Does your organisation have a policy or engagement process with clients and customers in place to encourage sustainable practices?

Yes In progress No

Does your organisation have a policy for sectors in which you have identified the highest (potential) negative impacts?

Yes In progress No

Describe how your organisation has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities. It should include information on relevant policies, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved.

As a mutual, we are here to support our customers, most of whom are members of the Society (those with a current account, mortgage or savings with us). Our purpose-led strategy means we act responsibly, doing business in a way that positively impacts our members and customers, as well as our employees, communities and society as a whole. We have a robust suite of controls, policies and practices that support our strategy and promote responsible relationships with our customers. This includes policies and procedures around economic crime, fraud, cyber security, data security, responsible marketing and responsible products and services.

We aim to support and protect our customers' financial wellbeing and have a range of initiatives in place to promote this. We believe in encouraging good savings habits, and the financial security this can provide customers in the long term. Our Start to Save account is aimed at supporting those new to saving, and we aim to make saving easier through Banking app features such as our Impulse Saver, Round-Ups and Savings Goals tools, and our free SavingsWatch service, which provides notifications to customers when interest rates change or new products are launched. In addition, we support and engage with our customers through financial education events, to help them more confidently manage their money. This has included events on how to recognise scams, and on using our Banking app and Internet Bank safely. We also provided investment education, and events to support first time buyers through the home buying process. In addition, we have held Money Lessons in over 400 schools, supporting over 40,000 students and increasing financial inclusion and knowledge.

Supporting our customers through the cost of living crisis has remained a priority. We have invested £100 million in cost of living support, and giving money back to our current account customers, through cashback on their supermarket and convenience store purchases when using their Nationwide debit cards between February and April 2023. It also included providing cost of living payments to our colleagues, and putting in place practical support for customers in our branches, a dedicated cost of living telephone helpline, which has now handled over 4,000 calls, and an online cost of living support hub. Other ways in which we have helped customers can be found on page 19 of this report.

Meeting the needs of all our customers, including those in vulnerable circumstances, is important to us. Our specialist teams support our most vulnerable customers, and we partner with gambling, debt, and mental health charities where customers need assistance beyond their banking needs.

Helping people into homes also remains core to our strategy today. We continue to focus on supporting first time buyers, and the provision of safe and secure homes for renters through buy to let lending on homes that are compliant with, or exceed, the Decent Homes Standard recommendations. We also support those in more vulnerable housing situations through our lending to the social housing sector.

Annual report and accounts:
[Engaging with our stakeholders, pages 29-35](#)

Climate-related financial disclosures: [Strategy, pages 7-16](#)

Website: [Nationwide policies and statements](#)

Website: [Policies for third party suppliers](#)

Website: [Greener Homes](#)



Principle 3: *Clients and customers*

3.1. Client engagement (continued)

As a mutual, our business model means that our strategy does not involve lending to, or investing in, the fossil fuel industry. We recognise the impact that climate change may have on our customers and their homes and have responded with a selection of green propositions and initiatives to support them in greening their homes. However, we remain cognisant of the significant challenges around greening UK homes, as described on page 19 of this report. We continue to engage with our customers through our Greener Homes hub on our website, which includes access to our green products and tips for creating a greener home. Our new Home Energy Efficiency Tool supports customers in understanding the benefits of retrofitting their homes and helps them make better choices when considering different retrofit options. More on our green propositions can be found on page 20 of this report.

We regularly engage with the housing associations we lend to, to understand and support them with their net-zero journey. We worked with them to understand their needs for sustainable social housing propositions and developed a sustainability linked loan (SLL) for Registered Social Landlords (RSLs) in response. Our SLLs aim to reward housing associations with a rate reduction if they achieve agreed sustainability criteria across their portfolio. We conduct annual due diligence to understand how they are performing against their sustainability targets, which we expect to drive energy sustainability improvements across our social housing portfolio. We also ask RSLs to complete detailed questionnaires that provide us with EPC data on the portfolios on which we lend, so we can monitor their progress in achieving higher EPC standards, with an aim for the majority of their portfolios to be rated EPC C or higher by 2030.

We have also taken steps to build sustainable considerations into our procurement and supply chain management processes. Our Third Party Code of Practice includes a requirement for all large¹ third parties to monitor and disclose their scope 1 and 2 emissions and set reduction targets. We recommend that small and medium enterprises do the same. We also partnered with sustainability ratings provider EcoVadis to monitor our suppliers' environment, labour, human rights, ethics and sustainable procurement activities. We have set a minimum benchmark sustainability rating for suppliers and are supporting them in meeting this. We also introduced a 10% minimum weighting for sustainability actions in our supplier tendering process.

¹Suppliers with over 250 employees.



Principle 3: *Clients and customers*

3.2. Business opportunities

Describe what strategic business opportunities in relation to the increase of positive and the reduction of negative impacts your organisation has identified and/or how you have worked on these in the reporting period. Provide information on existing products and services, information on sustainable products developed in terms of value (USD or local currency) and/or as a % of your portfolio, and which SDGs or impact areas you are striving to make a positive impact on (e.g. green mortgages – climate, social bonds – financial inclusion, etc.).

Nationwide was founded to help people into homes of their own, and this remains important to our strategy today. We continue to focus on helping first time buyers into homes through addressing the two main challenges they face, of raising a deposit and being able to borrow enough to afford a property. Our Helping Hand mortgage has successfully supported affordability, enabling first time buyers to borrow more (up to 5.5 times their salary). It is also extends to 95% loan to value (and without relying on the Government's 95% mortgage scheme), reducing the pressure on first time buyers of saving for a larger deposit. First time buyers received £500 cashback when they took out a mortgage with us and we offered online educational sessions that provided support with the homebuying process. Our Mutual Good Commitment reflects our ambitions, and aims to help 250,000 people to buy their first home by 2025 (against a baseline of November 2020). To date, we have helped 196,000 people into their first home, ahead of our cumulative target for 2023 (of 140,000).

Nationwide is also committed to providing £1 billion of new lending to support the social housing sector by 2025 (against a baseline of March 2022). To date, our lending of £409 million has exceeded our cumulative target for 2023 (of £300 million).

Nationwide seeks to encourage a positive savings culture, through offering competitive savings rates as well as with attractive propositions that support those new to saving. Our Start to Save Issue 2 account is aimed at supporting those new to saving, and has helped over 15,000 people save at least £100 for the first time with us in the past year. We have also invested £100 million in supporting our customers through the cost of living crisis, as described on page 17 of this report. In addition, for the 38,000 customers we have identified as being potentially more vulnerable to cost of living pressures, based on their overdraft and credit usage, we applied an automatic six-month overdraft interest holiday. This protected and supported them to reduce borrowing without affecting their credit score. We also reduced the interest rate for those on persistent debt plans. Our Mortgage Manager tool allows borrowers to review their terms and consider payment options, with access to support if they struggle to meet repayments. And we held nine Money Matters webcasts over the year, that provided practical help with managing money.

The extension of our Branch Promise, to keep a branch in every town or city we are in today, until at least 2024, means we can be there for our customers who rely on our branches or prefer to speak to us face to face. Our branches offer free financial health checks and our specialist support teams support our most vulnerable customers.

We continue to work to protect our customers from fraud. In 2021, we launched our Scam Checker Service, underpinned by our Scam Protection Promise, as described on page 12 of this report. Our Mutual Good Commitment to protect our customers' financial wellbeing is supported by our target to protect 750,000 customers with our Scam Checker Service by 2025 (set against a baseline of March 2022). To date, we have protected 505,000 customers through our Scam Checker Service, ahead of our cumulative target for 2023 (of 250,000 customers).

Nationwide is committed to a net-zero future, and it is our aspiration to support the UK in achieving its ambition to be net-zero by 2050. In 2021, we became a member of the Net-Zero Banking Alliance (NZBA) and part of the Glasgow Financial Alliance for Net Zero (GFANZ), committing to playing our part in supporting the transition to a net-zero economy (to achieve an overall balance between greenhouse gas emissions produced and taken out of the atmosphere). In December 2022, we set highly challenging intermediate (by 2030) science-based targets to work towards this. We recognise that science-based targets are particularly challenging for residential mortgages, and we will not be able to achieve the reduction in emissions to deliver our intermediate target without broader government policy changes and significant cross-industry collaborative effort.

Climate-related financial disclosures: [Ambition and disclosure overview, pages 3-6](#); [Strategy, pages 7-16](#); [Metrics and targets, pages 27-47](#)

Intermediate net-zero ambitions 2022: Basis of preparation: [Intermediate science-based targets, pages 5-7](#)

Website: [Greener Homes](#)

Website: [Procurement for mutual good](#)

Website: [Investor Relations](#)



Principle 3: *Clients and customers*

3.2. Business opportunities (continued)

Nationwide's business model means that our strategy does not involve lending to, or investing in, the fossil fuel industry. This means we are able to focus our efforts on creating opportunities around greening both our own operations and those of UK homes, in line with our Mutual Good Commitment to support progress towards a greener society.

We offer a range of green finance propositions and initiatives to support our customers in greening their homes. We have provided green finance since 2020 and offer our customers, and The Mortgage Works customers, preferential rate mortgages and additional borrowing to support green home improvements (through our Green Additional Borrowing and Green Further Advance products), as well as incentivising the purchase of more energy efficient properties (through our Green Reward mortgage which offers cashback to customers purchasing a home rated EPC A or high B). However, take-up by customers remains low, illustrating that other barriers exist beyond access to green finance, as documented on pages 9 and 43 of our climate-related financial disclosures. In June 2023, we launched a 0% Green Additional Borrowing product. This proposition offers 5,000 existing owner-occupier mortgage customers the opportunity to borrow interest free between £5,000 and £15,000, at up to a maximum 90% LTV across 2 and 5-year terms, to finance a range of retrofit home improvements. All of the loan must be used to fund non-structural, energy-efficient home improvements, such as solar panels, air source heat pumps, window upgrades, boiler upgrades, cavity wall insulation, loft insulation or electric car charging points. It is our aim to understand if this product increases customer uptake to making green home improvements. Our new Home Energy Efficiency Tool supports our customers in making better choices when considering retrofit options.

Between 2021 and 2022, we ran a solar panel pilot to a small number of customers (under 300) with our partner, MakeMyHouseGreen. The aim of the pilot was to simplify the journey and support consumers in understanding their options when buying solar panels, by providing a trusted supply chain to carry out the work. It enabled us to learn about the challenges and barriers consumers faced in the retrofit journey. More on this can be found on pages 9 and 43 of our climate-related financial disclosures.

We have also developed a Sustainability Linked Loan (SLL) for Registered Social Landlords (RSLs). This rewards housing associations with a rate reduction if they achieve agreed sustainability criteria across their portfolio, supporting them in their net-zero journey.

Nationwide has funded the (not-for-profit) Oakfield housing development in Swindon, consisting of 239 EPC A-rated homes, the first home of which went on sale in December 2022. We worked closely with the local community in the design and planning of the homes. The development won the Landscape Institute Building with Nature National Award 2022. We hope that our approach to Oakfield will become a blueprint to help other responsible organisations who wish to build housing developments in collaboration with local communities.

We are also proud of the progress we have made in reducing the emissions of our own operations. Since 2018, all our electricity has been supplied from renewable sources, and we have remained carbon neutral¹ for all energy use and our internal business operations since 2020. As at the end of 2022, we had removed the use of gas from over 75% of our branch network and we are on track to remove 100% of gas from our branches by 2030, replacing it with electrical solutions. We have also built climate change considerations into our third-party processes. More information on this, and our green credentials more broadly, can be found in our climate-related financial disclosures.

Over the year, the combination of our progress on environmental, social and governance (ESG) activities and initiatives, enhancements made through our ESG disclosures and engagement with ESG rating agencies (for example, on the merits of our mutual business model) has resulted in an improvement in Nationwide's ESG ratings by MSCI and Sustainalytics. Over the year, we also received an upgrade in our CDP rating. Our ESG ratings can be found on the investor relations page on our website.

¹We achieved carbon neutrality by a combination of eliminating our emissions and funding equivalent carbon savings through renewable or offsetting projects.

Principle 4: *Stakeholders*



We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.

4.1. Stakeholders

Does your organisation have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups) you have identified as relevant in relation to the impact analysis and target setting process?

Yes In progress No

Please describe which stakeholders (or groups/types of stakeholders) you have identified, consulted, engaged, collaborated or partnered with for the purpose of implementing the Principles and improving your organisation's impacts. This should include a high-level overview of how your organisation has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

Listening to and engaging regularly with our stakeholders is fundamental to the way we do business, and it ensures we operate in a balanced and responsible way, both in the short and longer term. As a mutual, we are owned by our members (our customers who have their current account, mortgage or savings with us) and so they are our primary stakeholders. We also have several other important stakeholders who we engage with and consider in our decision-making. These include our broader retail customers (most of whom are members), buy to let customers, employees, mortgage intermediaries, investors and rating agencies, communities, suppliers, and regulators and policy makers. Details, and examples, of how we engage with our stakeholders can be found on pages 29-35 of our Annual Report and Accounts.

In forming our five Mutual Good Commitments, we incorporated the views of a wide range of stakeholders – customers, non-customers, employees, mortgage intermediaries, suppliers and investors – to understand the ESG issues that mattered most to them. Our Commitments are also led by our strategy and are focused in areas where we believe we can have the most positive impact across broader society.

We continue to engage with our stakeholders across a variety of channels. The cost of living crisis remains a key theme in our engagement with customers and, as a mutual, supporting our customers through this crisis remains a priority for us, and is aligned with our Mutual Good Commitment to protect our customers' financial wellbeing. We have invested £100 million in cost of living support, and through our current account cashback offer between February and April 2023, where customers earned 5% cashback on their debit card purchases in supermarkets, up to £10 each month. This included our cost of living payments to colleagues; practical support for customers in branches (including financial health checks) and our dedicated cost of living telephone helpline.

We have sought to increase financial inclusion and empowerment. As part of this, since April 2022 we have held Money Lessons in over 400 schools, supporting over 40,000 students. We also hold education events around recognising scams, using our Banking app and Internet Bank safely, and events to support first time buyers through the home buying process. Other topics raised by customers at our Annual General Meeting, Talkbacks and via our Member Connect online forum during the year included protection from fraud and scams, maintaining access to branches and to cash, and acting responsibly, including our approach to climate change and net-zero commitments. Our Mutual Good Commitments, as described on pages 11-13 of this report, demonstrate our focus on these current issues.

Annual report and accounts: [Engaging with our stakeholders, pages 29-35](#)

Climate-related financial disclosures: [Strategy, pages 7-16](#)

Intermediate net-zero ambitions 2022: Basis of preparation

Social Investment Impact Report

Website: [The Nationwide Foundation](#)

Website: [Working with others | Nationwide](#)

Website: [Investor Relations](#)



Principle 4: *Stakeholders*

4.1. Stakeholders (continued)

In implementing our Mutual Good Commitment to help to achieve safe and secure homes for all, we partner with the national housing charity Shelter, a charity whose focus is on helping those in housing need and tackling homelessness. Each year, we commit at least 1% of our pre-tax profits¹ to charitable activities, largely focused on housing. At least a quarter of this commitment is awarded to the Nationwide Foundation, an independent charity, whose vision is for everyone in the UK to have access to a decent home that they can afford.

We partner, and play an active role, with a number of key organisations to increase our knowledge on important ESG issues and effect real change. We took part in the UNEP FI PRB peer exchange session on affordable housing in February 2023, sharing our work on our Mutual Good Commitment to help to achieve safe and secure homes for all, as well as gaining an insight into the challenges faced and solutions implemented by banks across a range of other countries. In addition, we continue to engage with, and influence, policymakers to encourage the development of green policies which support wider society in making the changes needed to achieve a just transition to net-zero. Our Green Homes Action Group, formed of a group of 15 cross-sector organisations and leaders, aims to address some of the barriers to greener homes. The group has campaigned to government for a National Retrofit Strategy to encourage the greening of UK homes, and has proposed seven policy asks to support this. More information on our partnerships and Green Homes Action Group can be found in our climate-related financial disclosures.

We engage with colleagues on sustainable matters through our employee Green Network. Our Green Network has over 4,500 colleague members, and shares information on how colleagues can be greener at work, at home, through travel and across their lifestyles. We also recently launched an electric vehicle (EV) salary sacrifice scheme, which is available to all employees to encourage electric vehicle ownership. In 2022, we launched an all-colleague climate change e-learning module, which introduced climate change, climate-related risk, and the UK's net-zero ambition to our colleagues. As at 4 April 2023, around 70% of all Nationwide employees had completed this voluntary training. Training on how to purchase responsibly is also available on our employee learning platform, which supports self-led learning, and has been completed by 96% of our Procurement team. In addition, resources have been developed to support employees in making small, green, changes to their lifestyle through our employee Sustainability Toolkit.

In 2022, Nationwide changed the default investment option for members of Nationwide's Group Personal Pension (GPP). Nationwide's Pension Governance Committee regularly reviews the GPP default investment option and agreed to change the underlying equity funds (for scheme members more than 10 years away from their selected retirement age) to invest in companies that adhere better to ESG principles. Colleagues can opt out of the default investment option and make their own investment choices if they so wish. This investment strategy is aligned with Nationwide's climate strategy.

In implementing our Mutual Good Commitment to reflect the diversity of the society we represent, in 2022 we launched our eleventh employee network, focused around social mobility. The others are centred around: gender; ethnicity; sexual orientation; disability; faith and belief; working carers; working families; veterans and reservists; mental wellbeing; and sustainability. We also partnered with Progress Together, a membership body centred around progression, retention and socio-economic diversity in financial services. With their support and input, we have begun to gather voluntary socio-economic data from our colleagues, to help us benchmark our socio-economic diversity against our peers and inform our future inclusion, diversity and wellbeing priorities. We aim to progress our diversity ambitions through the delivery of our refreshed strategy, which includes activity to improve social mobility.

We have continued to enhance our disclosures to meet investors' information needs and areas of interest, including through our climate-related financial disclosures. In keeping with our commitment through our partnership with the Net-Zero Banking Alliance, in December 2022 we published our intermediate (by 2030) science-based targets, supported by comprehensive disclosures detailing how we will progress towards these. We engage with ESG rating agencies to ensure the Society is rated appropriately. Our disclosures, and engagement, has led to an upgrade in the Society's ratings with MSCI and Sustainalytics. Over the year, we also received an upgrade in our CDP rating. Our ESG ratings can be found on our investor relations website.

¹The 1% is calculated based on average pre-tax profits over the previous three years.

Principle 5: *Governance and culture*



We will implement our commitment to these Principles through effective governance and a culture of responsible banking.

5.1. Governance structure for implementation of the Principles (Key Step 3)

Does your organisation have a governance system in place that incorporates the PRB?

Yes In progress No

Please describe the relevant governance structures, policies and procedures your organisation has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support the effective implementation of the Principles. This includes information about:

- which committee has responsibility over the sustainability strategy as well as targets approval and monitoring (including information about the highest level of governance the PRB is subjected to),
- details about the chair of the committee and the process and frequency for the board having oversight of PRB implementation (including remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected), as well as
- remuneration practices linked to sustainability targets.

Nationwide has a well-established governance structure for ensuring that the activities that support implementation of the Principles for Responsible Banking are effectively being managed, implemented and overseen.

The Board: The Board sets Nationwide's strategic direction, to include our ESG strategy. It has responsibility for assessing the principal risks facing the Society and approving Nationwide's risk appetite, following oversight and advice from the Board Risk Committee (BRC). The Board receives regular reports and assessments of Nationwide's risk and control processes and recommendations from BRC on matters spanning all risk categories, including the appropriate level of risk appetite. In 2022, the Board approved the Society's intermediate (by 2030) science-based targets. It also received quarterly updates on the progress made towards our Mutual Good Commitments.

Risk Committees: The Board Risk Committee (BRC) and Executive Risk Committee (ERC) oversee and manage Nationwide's risk appetite. There are a number of management committees that feed into the ERC, that have responsibility for managing risks more broadly across the wider Society, many of which include both environmental and social aspects. These committees include, among others, Credit Committee, Conduct and Operational Risk Committee, and Economic Crime Risk Committee. ERC and BRC also have responsibility for the oversight of climate-related risks, which are discussed at the ERC and at the BRC every six months. More detail on Nationwide's risk committee structure and responsibilities can be found on page 142 of our Annual Report and Accounts.

Responsible Business Committee (RBC): The RBC is accountable for managing Nationwide's responsible business agenda, including progress made against our Mutual Good Commitments and the strategic approach to addressing our climate change and environmental ambitions. It meets every other month and is chaired by the Director of Strategy, Performance and Sustainability. Matters are escalated to the Executive Committee (ExCo) as appropriate. Over the year, the ExCo approved updates to the underlying targets that support our Mutual Good Commitments, so that they remain closely aligned to our refreshed strategic priorities. The broad membership of the RBC ensures appropriate consideration, monitoring, and management of ESG-related (including climate-related) risks and opportunities by senior management.

Climate-related financial disclosures: [Governance, pages 17-22](#)

Annual report and accounts: [Board leadership and Society purpose, pages 85-89; Risk committee structure, page 142](#)

Principle 5: *Governance and culture*

5.1. Governance structure for implementation of the Principles (Key Step 3) (continued)

Climate Change Risk Committee (CCRC): The CCRC is responsible for the day-to-day monitoring of climate-related risk. A comprehensive climate change MI dashboard is presented quarterly to the committee to provide context and support decision-making. The CCRC meets monthly and an executive summary is reported up to the RBC every two months. Key climate-related risks and relevant climate change subject matters are escalated to ERC and to BRC every six months. The CCRC is supported by the Climate Change Plan Working Group (that meets monthly and has day-to-day responsibility for implementing our climate change plan) and the Climate Change Stress Testing Working Group (that has responsibility for supporting the preparations for, and execution of, climate-related stress tests, by overseeing the day-to-day delivery against planned milestones). More information on the governance model, and on the discussions and decisions made at the committees set out above, can be found on pages 17-22 of our climate-related financial disclosures.

More information on remuneration practices linked to sustainability targets can be found on page 25 of this report.

5.1. Governance structure for implementation of the Principles (Key Step 3) – Self-assessment summary

Does the CEO or other C-suite officers have regular oversight over the implementation of the Principles through the organisation's governance system?

Yes No

Does the governance system entail structures to oversee PRB implementation (e.g. incl. impact analysis and target setting, actions to achieve these targets and processes of remedial action in the event targets/milestones are not achieved or unexpected neg. impacts are detected)?

Yes No

Does your organisation have measures in place to promote a culture of sustainability among employees (as described in 5.2)?

Yes No



Principle 5: *Governance and culture*

5.2. Promoting a culture of responsible banking

Describe the initiatives and measures of your organisation to foster a culture of responsible banking among its employees (e.g., capacity building, e-learning, sustainability trainings for client-facing roles, inclusion in remuneration structures and performance management and leadership communication, amongst others).

Our purpose-led strategy means we act responsibly, doing business in a way that positively impacts our customers, employees and communities, while seeking to reduce our impact on the environment.

Code of Conduct: Our Code of Conduct helps to ensure we operate ethically and sustainably. It guides colleagues on the standards of conduct and behaviour we expect from them, so that we do the right thing for our customers. We encourage our colleagues to speak up if they witness or experience actions or behaviours that do not match our values, and provide a range of channels for which to do this. We also have a well-established whistleblowing policy if they wish to remain anonymous.

Training: We have a suite of controls, policies and practices that support a culture of responsible behaviour among colleagues. All colleagues are requested to undertake annual, mandatory training courses across several topics including anti-bribery and corruption, market abuse, conflicts of interest, data protection, information security, economic crime (including modern slavery and human trafficking), health and safety and speaking up and whistleblowing. We also have measures in place to promote inclusion, diversity and wellbeing. Colleagues in regulated advice roles, such as our mortgage advisers, are also equipped with role-specific qualifications and receive regular updates in training, and are subject to quality checks. To support the embedding of sustainability into our culture, in 2022 we launched an all-colleague climate change e-learning module, which introduced climate change, climate-related risk, and the UK's net-zero ambition to our colleagues. As at 4 April 2023, around 70% of all Nationwide employees had completed this voluntary training. An ESG information sheet was also developed to support branch colleagues with their understanding of sustainability at Nationwide. Training on how to purchase responsibly is available on our employee learning platform, which supports self-led learning, and has been completed by 96% of our Procurement team. This training is designed to help colleagues understand why we must take action to manage the environmental and social impacts of our purchasing and supplier management activities.

Remuneration and Reward: Our employee annual bonus scheme is based on the Society's overall performance, and reflects our success in achieving the things that are most important to our customers. This ensures we drive the right behaviours and act for the mutual good of our customers. In 2023 we introduced a long-term performance pay plan for our most senior leaders, including our executive directors. This plan aims to incentivise sustainable long-term performance and alignment with customer interests. The long-term performance pay plan is linked to measures that support a culture of responsible banking, including customer satisfaction, progress against our scope 1 and 2 carbon emissions targets and diversity targets around gender and ethnicity at senior levels, progress against a set of risk and compliance measures, and delivery of our priorities under our four strategic drivers.

Employee networks: We have eleven employee networks, that are centred around gender, ethnicity, sexual orientation, disability, faith and belief, working carers, working families, veterans and reservists, mental wellbeing, sustainability and, since 2022, social mobility. Our networks celebrate diversity and drive supportive changes across the business that promote further inclusivity. More information can be found on page 32 of our Annual Report and Accounts. The employee networks support us in driving progress towards our Mutual Good Commitment to reflect the diversity of the wider society that we represent, so that we can achieve the diverse range of backgrounds, skills and experiences we need to continue to serve our members in the best way, and offer the services and products that are most relevant to them. Our Green Network aims to support employees with information on green and sustainability matters, and shares tips on becoming more sustainable at work, at home, through travel and across their lifestyles.

Annual report and accounts: [Colleagues, page 32; Report of the directors on remuneration, pages 114-134](#)

Website: [Nationwide policies and statements](#)

Principle 5: *Governance and culture*

5.3. Policies and due diligence processes

Does your organisation have policies in place that address environmental and social risks within your portfolio? Please describe.

Please describe what due diligence processes your organisation has installed to identify and manage environmental and social risks associated with your portfolio. This can include aspects such as identification of significant/salient risks, environmental and social risks mitigation and definition of action plans, monitoring and reporting on risks and any existing grievance mechanism, as well as the governance structures you have in place to oversee these risks.

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 page 23 of this report. Our Responsible Business Committee also has responsibility for taking and co-ordinating any remedial action needed to support us in achieving our Mutual Good Commitment targets.

Managing environmental risks

Since 2019, Nationwide has been enhancing and embedding its capabilities to monitor and manage climate-related risk and meet the requirements of the Prudential Regulation Authority's (PRA's) Supervisory Statement 3/19 (SS3/19). Whilst we meet the requirements of SS3/19, we recognise that capability and industry practice will continue to advance, and we intend to further enhance both our understanding and capability in this area.

Nationwide identifies, assesses, and manages climate-related risk through its established Enterprise Risk Management Framework (ERMF). Climate change is embedded as a cause within our ERMF, ensuring climate-related risks are integrated into our overall risk management. There are five core components of our ERMF, namely risk appetite, policy, risk management, reporting, and enablers and governance, which connect our risk management with how we run our business.

Our Climate Change Risk Standard aids the embedding, monitoring and managing of climate-related risk as a cause to the Society's principal risks. It articulates the principles and requirements that must be met to manage the risks arising from climate change, and how climate-related risk may occur across the ERMF. A climate change MI dashboard is presented quarterly to Climate Change Risk Committee (CCRC) to support decision-making.

We have a climate-related risk appetite statement, as follows: "We are committed to working towards alignment to a net-zero emissions pathway to 2050. We will seek to minimise the impact of physical and transition climate risk on Nationwide and our customers". This is supported by management risk appetite metrics that control the flow of new lending to residential properties more susceptible to flooding and to less energy efficient properties in the buy to let market. Our metrics track data from our Property Risk Hub, which assesses a property's exposure to physical risk as part of the mortgage underwriting process, along with EPC data (which informs the transition risk of properties). This ensures we continue to lend in a responsible, sustainable way, while safeguarding our customers by considering physical and transition risk across short, medium and long term horizons. More on our approach and performance against our metrics can be found in our climate-related financial disclosures.

We support our climate-related risk management with scenario analysis. In 2021, we completed the Bank of England's Biennial Exploratory Scenario: Financial risks from climate change (CBES), which increased our understanding of the impact of climate risk on our Society and our customers. In 2023, we plan to undertake an internal scenario analysis exercise, implementing learnings and enhancing previous modelling capabilities, which will include using a dynamic balance sheet to quantify better the financial risks arising from the physical and transitional impacts of climate change. The analysis will include assessing different climate change scenarios, including a 2°C or lower temperature rise scenario.

Climate-related financial disclosures: [Risk management, pages 23-26](#)

Annual report and accounts: [Our Mutual Good Commitments, pages 46-51; Beacon for Mutual Good, pages 19-20](#)

Website: [Nationwide policies and statements](#)

Social Investment Impact Report

Website: [Third party code of practice](#)

Environmental Standard



Principle 5: *Governance and culture*

5.3. Policies and due diligence processes (continued)

More broadly, our Environmental Standard reinforces our ambition to operate sustainably and protect the environment, and directs colleagues to the relevant policies, guides and training to support us in achieving this.

Managing social risks

Our Responsible Business Committee is accountable for managing Nationwide's responsible business agenda, including progress made against our Mutual Good Commitments, which cover primarily social, but also our environmental, ambitions. Our Mutual Good Commitments promote financial inclusion and the accessibility of financial services and housing, for example by maintaining a strong branch network and ATM presence, supporting first time buyers onto the housing ladder, and supporting quality rental properties and the provision of social housing, helping more people to have a place fit to call home.

More broadly, Nationwide's mutual purpose guides our culture and behaviours, which are formalised through our Code of Conduct. Our suite of policies and procedures ensure we act responsibly with our customers, and include those around economic crime (including modern slavery and human trafficking), fraud, cyber security, data security, taxation, responsible marketing and responsible products and services.

We recognise and understand the impact that health, life events, financial resilience and financial capability issues may have on our customers' accessibility to services and financial needs. Some needs are permanent, whilst others are temporary or transient and could affect any of our customers at any time. We have a dedicated support team and measures in place to support our more vulnerable customers. Our enhanced transaction monitoring practices undertaken by our economic crime teams support our identification of customers at risk. We seek to support the more vulnerable in broader society too, through our social investment programme and long-term partnership with national housing charity Shelter. More information on our social investment programme can be found on pages 19-20 of our Annual Report and Accounts, and more on the positive impacts this has had across our communities can be found in our Social Investment Impact report.

We use our expertise in housing and finance to campaign for positive changes in housing policy and fair outcomes for customers. For example, we have previously successfully campaigned, along with others, to make it unlawful for blanket bans to be applied on renting properties to those receiving benefits. We also engage with regulators and policymakers on other social issues, and in the past year this has included access to cash, economic crime, reform of the private rented sector, first time buyers, social housing, green homes and cost of living support.

Supporting our supply chain in managing environmental and social risks

Our Procurement for Mutual Good programme supports us in driving a supply chain that is greener, more inclusive and more ethical than before, and we have further embedded environmental and social considerations into our procurement and supply chain management processes. We set expectations for environmental and social standards in our Third-Party Code of Practice.

Our Procurement for Mutual Good programme won Best Sustainability Project of the Year in the 2021 Chartered Institute of Procurement and Supply (CIPS) Excellence in Procurement Awards. Through this programme, we are part of the Buy Social Corporate Challenge, seeking to source more goods and services from social enterprises. We are also part of the Minority Supplier Development Network (MSDUK) seeking to build diverse and inclusive supply chains.

Through our partnership with EcoVadis, a sustainability ratings provider, we monitor our suppliers' sustainability performance across environment, labour, human rights, ethics and sustainable procurement activities. We have set a minimum benchmark sustainability rating for suppliers and are supporting them in meeting this. We have also introduced a 10% minimum weighting for sustainability actions as part of our supplier tendering process.

Principle 6: *Transparency and accountability*



We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.

6.1. Assurance

Has this publicly disclosed information on your PRB commitments been assured by an independent assurer?

Yes Partially No

If applicable, please include the link or description of the assurance statement.

Nationwide appointed Ernst and Young LLP (EY) to provide limited independent assurance over our scope 1, 2 and 3 carbon emission disclosures for the year ended 4 April 2023 (assured metrics and key performance indicators are indicated throughout our climate-related financial disclosures). These underpin our measures for our Mutual Good Commitment to support progress towards a greener society. It includes scope 1 and 2 emissions for the year ended 4 April 2023 and scope 3 financed (investment and upstream) emissions for the 12-month period ended 31 December 2022. Assurance was also provided for the year ended 4 April 2022, as disclosed in our Climate-related Financial Disclosures 2022. The assurance engagement was planned and performed in accordance with the International Standard for Assurance Engagements (ISAE) (UK) 3000 (July 2020), Assurance Engagements Other than Audits or Reviews of Historical Financial Information. A limited assurance report for our carbon emission disclosures was issued and is available on the Nationwide website¹. This report includes details of the scope, respective responsibilities, work performed, limitations and conclusion.

Climate-related financial disclosures: [Metrics and targets, page 28](#)

6.1. Assurance

Does your organisation disclose sustainability information in any of the listed below standards and frameworks?

GRI
 SASB
 CDP
 IFRS Sustainability Disclosure Standards (to be published)
 TCFD
 Other:

As well as disclosing sustainability information through TCFD and CDP and through our UNEP FI PRB report, we also disclose sustainability information through our UNGC Communication on Progress report and Modern Slavery and Human Trafficking Statement.

Climate-related financial disclosures

Website: [UN Communication on Progress](#)

Website: [Modern slavery and human trafficking statement](#)

Website: [CDP](#)

¹EY emissions assurance report 2023.



Principle 6: *Transparency and accountability*

6.3. Outlook

What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis, target setting and governance structure for implementing the PRB)? Please describe briefly.

We will continue to drive progress towards our Mutual Good Commitment targets over the coming 12 months. We also plan to run our third materiality assessment, to help ensure we continue to focus in the areas that matter most to our stakeholders. In 2023, we will undertake a broader review of our social investment strategy and consider whether the existing targets remain most appropriate. Last year, we began a focus on social mobility and will undertake work this year to benchmark our socio-economic diversity against our peers, in order to help inform our future inclusion, diversity and wellbeing priorities. We are also reviewing our longer-term diversity measures in light of latest census data, in order to make sure our measures reflect the diversity of UK society.

In 2023, we plan to undertake an internal climate-related scenario analysis exercise, implementing learnings from our participation in the Bank of England's 2021 Biennial Exploratory Scenario: Financial risks from climate change (CBES) and enhancing previous modelling capabilities. This will include using a dynamic balance sheet to quantify better the financial risks arising from the physical and transitional impacts of climate change. In line with our commitment to the Net-Zero Banking Alliance (NZBA) and Glasgow Financial Alliance for Net Zero (GFANZ), we are working to develop a net-zero aligned transition plan to support our intermediate (by 2030) science-based targets.

6.4. Challenges

Here is a short section to find out about challenges your organisation is possibly facing regarding the implementation of the Principles for Responsible Banking. Your feedback will be helpful to contextualise the collective progress of PRB signatory organisations.

What challenges have you prioritized to address when implementing the Principles for Responsible Banking? Please choose what you consider the top three challenges your organisation has prioritized to address in the last 12 months (optional question).

If desired, you can elaborate on challenges and how you are tackling these:

- | | | |
|--|---|--|
| <input type="checkbox"/> Embedding PRB oversight into governance | <input type="checkbox"/> Setting targets | <input type="checkbox"/> Access to resources |
| <input type="checkbox"/> Gaining or maintaining momentum in the organisation | <input type="checkbox"/> Customer engagement | <input type="checkbox"/> Reporting |
| <input type="checkbox"/> Getting started: where to start and what to focus on in the beginning | <input type="checkbox"/> Stakeholder engagement | <input type="checkbox"/> Assurance |
| <input type="checkbox"/> Conducting an impact analysis | <input type="checkbox"/> Data availability | <input type="checkbox"/> Prioritizing actions internally |
| <input type="checkbox"/> Assessing negative environmental and social impacts | <input type="checkbox"/> Data quality | <input checked="" type="checkbox"/> Other: Government policy |
| <input type="checkbox"/> Choosing the right performance measurement methodology/ies | | |

If desired, you can elaborate on challenges and how you are tackling these:

We consider it highly unlikely at present, that our targets for scope 3 investment emissions can be achieved under current governments policies in connection with the UK's housing stock. Emissions associated with our residential mortgage lending account for the majority (more than 80%) of our total scope 3 emissions and we have very limited control over practical measures to reduce the emissions from properties which are owned by our borrowers.

Separately, we achieved four of our seven diversity measures to meet by 2023, as set out on pages 50-51 of our Annual Report and Accounts. We recognise that further focus is needed to increase representation of Black, Asian, mixed and other ethnically diverse colleagues in senior roles and across our overall employee population. Our representation of women in our leadership population was also slightly behind our 2023 measure. More information on how we seek to progress these measures through delivery of our refreshed strategy can be found on page 50 of our Annual Report and Accounts.

