

GRI Standards Index 2019

This document has been prepared in accordance with the Global Reporting Initiative (GRI) Standards: Core option. This GRI Index covers our material topics and follows GRI Standards 2016 (later Standards updates from 2018 on Water and Occupational Health and Safety are not used).

The boundary for our dominant impacts, such as economic impact, low carbon transition and financial education, is clearly outside our organisation, and principally delivered through our Helping Britain Prosper Plan. To corroborate this, we indicate the boundary for each material topic in the tables that follow.

We publish our Responsible Business reporting suite annually. It follows the calendar year (noting that our environmental indicators relate to the period 1 October to 30 September) and refers to all of our legal entities. Our reporting includes information and data related to our strategy, governance, key initiatives and processes, performance and progress against our wider Responsible Business goals, and our Helping Britain Prosper Plan commitments.

- Annual Report and Accounts 2019
- Helping Britain Prosper Plan 2018 to 2020
- Helping Britain Prosper Plan 2014 to 2019 performance
- Equator Principles Table 2019
- Responsible Business Data Sheet 2019 – an overview of key financial, community and environmental performance
- Lloyds Banking Group 2019 Modern Slavery and Human Trafficking Statement
- Lloyds Banking Group 2019 Human Rights Policy Statement
- Lloyds Banking Group 2019 Reporting Criteria
- Lloyds Banking Group 2019 Materiality Summary

The above documents can be found in the **Reporting Centre** of our website.

Acronyms

LBG: Lloyds Banking Group

MA: Management Approach

RB Reporting: Responsible Business reporting suite

HBP: Helping Britain Prosper

ARA: Annual Report and Accounts

GHG: Greenhouse Gas

Inside: Relevant inside the organisation (topic 'Boundary')

Outside: Relevant outside of the organisation (topic 'Boundary')

Materiality

Our focus on being a responsible, sustainable and diverse business aligns with society's expectations and focuses on areas where we can achieve the greatest positive impact. Engaging with stakeholders enables us to understand what is important to them and help us shape our strategy and reporting.

Our **2019 Materiality Summary** outlines our approach and key material themes and prioritises a set of 'tier one' topics for which we have ambitious goals, and on which we commit to report progress annually. This GRI Index excludes topics that are not formally designated as 'material'. We continue to manage and report on a second set of 'tier two' topics, although the external disclosure is less extensive than for tier one.

An additional third tier of topics continue to be managed and reported, but they are not covered in this GRI Index owing to their level of materiality being below the thresholds used in the formal materiality assessment. Each one is important on its own merits and to specific stakeholders, so information and data on them can be found in our **Reporting Centre**. Further information on human rights, materials, water, energy and waste is also provided for consistency, some of which is externally verified (see Annex at the end of this document).

TIER 1 MATERIAL TOPIC	GRI STANDARDS – SPECIFIC
Helping the transition to a sustainable low carbon economy	201-2, 305-1, 305-2, 305-3, 305-4
Governance and accountability	205-2, 415-1, 419-1
Responsible and ethical lending	412-3, 417-1
Building capability and digital skills	203-2
Customer privacy and data security	418-1
Helping people buy a home	203-2
Helping people save for the future	203-2
Supporting businesses to start up and grow	203-2
TIER 2 MATERIAL TOPIC	GRI STANDARDS – SPECIFIC
Equal opportunities, inclusion and diversity	405-1, 405-2
Stakeholder engagement	413-1, 415-1
Vulnerable customers and financial education	413-1, G4 FS14
Community investment	413-1

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GENERAL STANDARD DISCLOSURES

DISCLOSURE	DESCRIPTION	RB REPORTING REFERENCES 2019	FURTHER COMMENTS
Organisational Profile			
102-1	Report the name of the organisation	ARA, Front Cover, Inside Front Cover	
102-2	Report the primary brands, products, and services	ARA, Inside Front Cover, p15, p37-39	
102-3	Report the location of the organisation's headquarters	ARA, Back Cover	
102-4	Report number of countries where organisation operates, and names of countries where either the organisation has significant operations or that are specifically relevant to the sustainability topics covered in the report	ARA, p332 -337	The Group primarily operates in the UK. Its main overseas operations are in the Americas and Europe and are not significant in comparison.
102-5	Report the nature of ownership and legal form	ARA, Inside Front Cover	
102-6	Markets served	ARA, p10, p14, p16, p20 Our External Environment	
102-7	Scale of organisation	ARA, Inside Front Cover, p8-9, p22	
102-8	Information on employees and other workers	Responsible Business Data Sheet 2019 p2	Employees are mainly in the UK and its region (includes the channel islands). To any significant extent, the Group's activities are not performed by workers who are not employees. There are no significant variations in the numbers reported in Disclosures 102-8 a, b and c.
102-9	Describe the organisation's supply chain	ARA, p25 Modern Slavery and Human Trafficking Statement p6-7	
102-10	Any significant changes during the reporting period regarding the organisation's size, structure, ownership, or its supply chain	ARA, p2	
102-11	Whether and how the precautionary approach or principle is addressed by the organisation	ARA, p28, p30	

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DISCLOSURE	DESCRIPTION	RB REPORTING REFERENCES 2019	FURTHER COMMENTS
Organisational Profile <i>continued</i>			
102-12	List externally developed economic, environmental and social charters, principles, or other initiatives to which the organisation subscribes or which it endorses	ARA, Inside Front Cover, p3, p7, p26-29, p31-34 2019 Human Rights Policy Statement p3 Modern Slavery and Human Trafficking Statement p3	<p>Signatories to include:</p> <ul style="list-style-type: none"> ➔ Equator Principles ➔ UN Global Compact ➔ UNEP FI Principles for Sustainable Insurance ➔ UN Principles for Responsible Investment ➔ UNEP FI Principles for Responsible Banking ➔ Mental Health Accessibility Standards ➔ Financial Abuse Code of Practice ➔ Climate Change Group Initiatives: RE100; EP100; EV100 <p>Recognise and guided by:</p> <ul style="list-style-type: none"> ➔ UN Sustainable Development Goals ➔ Organisation for Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises ➔ UN Guiding Principles on Business and Human Rights ➔ International Bill of Human Rights ➔ International Labour Organisation's (ILO) Core Labour Standards and its Tripartite Declaration of Principles

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DISCLOSURE	DESCRIPTION	RB REPORTING REFERENCES 2019	FURTHER COMMENTS
Organisational Profile <i>continued</i>			
102-13	Memberships of associations and national or international advocacy	ARA, p26, p31, p33-34 Trade Association Membership 2019 Human Rights Policy Statement p4, Modern Slavery and Human Trafficking Statement p4	Key memberships include: <ul style="list-style-type: none"> ➔ Cambridge Institute for Sustainability Leadership ➔ University of Cambridge Banking and Environment Initiative – Bank 2030 ➔ PRA and FCA Climate Financial Risk Forum ➔ Business Integrity Forum of Transparency International ➔ Coalition for Climate Resilient Investment ➔ Business in the Community ➔ Joint Fraud Taskforce ➔ Cyber Defence Alliance ➔ Financial Services Cyber Collaboration Centre ➔ Cross-Market Operational Resilience Group ➔ Apprenticeship Diversity Champions Network ➔ Joint Money Laundering Intelligence Taskforce ➔ Business Disability Forum (Gold Standard) ➔ Department for Work and Pensions Disability Confident Leadership ➔ UK Living Wage Foundation ➔ UK Finance ➔ The City UK ➔ Chartered Banker Institute ➔ Confederation of British Industry (CBI) ➔ Scottish Financial Enterprise (Bank of Scotland) ➔ Centre for European Reform ➔ Finance & Leasing Association ➔ Association of British Insurers ➔ Banking Environment Initiative ➔ The Institutional Investors Group on Climate Change ➔ Centre for the Study of Financial Innovation (CSFI) ➔ Business Finance Taskforce (UK Finance) ➔ British Vehicle Rental & Leasing Association

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DISCLOSURE	DESCRIPTION	RB REPORTING REFERENCES 2019	FURTHER COMMENTS
Strategy and Analysis			
102-14	Provide a statement from the most senior decision-maker of the organisation about the relevance of sustainability to the organisation and the organisation's strategy for addressing sustainability	ARA, p2, p5	
Ethics and Integrity			
102-16	Organisation's values, principles, standards and norms of behaviour such as codes of conduct and codes of ethics	Code of Responsibility ARA, p91, p162, p181	
Governance			
102-18	Governance structure, including committees of the highest governance body	ARA, p23, p26, p30, p65-97	
Stakeholder Engagement			
102-40	List of stakeholder groups engaged by the organisation	ARA, p20, p26-29, p31 2019 Materiality Summary	
102-41	Percentage of total employees covered by collective bargaining agreements	Modern Slavery and Human Trafficking Statement p4	
102-42	Basis for identification and selection of stakeholders with whom to engage	ARA, p20	
102-43	Approach to stakeholder engagement	2019 Materiality Summary p3 ARA, p20, p26	
102-44	Key topics and concerns that have been raised, and how the organisation has responded to key topics and concerns, including through reporting	2019 Materiality Summary p4 ARA, p20-25	
Report Practice			
102-45	Entities included in the consolidated financial statements	ARA, p36-39, p332-337	
102-46	Defining report content and topic boundaries	ARA, p26 2019 Materiality Summary	
102-47	List of material topics	2019 Materiality Summary p4	
102-48	Restatements of information	Responsible Business Data Sheet 2019 p3, ARA, p96-97 2019 Reporting Criteria	
102-49	Changes in reporting	2019 Materiality Summary p3-4	
102-50	Reporting period	2019 calendar year	
102-51	Date of most recent report	2019	
102-52	Reporting cycle	Annual	
102-53	Contact point for questions regarding the report	Contact Us	
102-54	Claims of reporting in accordance with the GRI Standards	ARA, p35	
102-55	GRI content index	Reporting Centre	
102-56	External assurance	2019 ARA Independent Assurance Statement by Deloitte LLP to Lloyds Banking Group	Selected data subject to Limited ISAE 3000 (revised) and ISAE 3410 assurance.

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ECONOMIC

SPECIFIC STANDARD DISCLOSURES

200: ECONOMIC TOPIC MANAGEMENT APPROACH (MA)

RELEVANT GRI DISCLOSURES	RELATED MATERIAL TOPIC	RB REPORTING REFERENCES 2019 MEETING MA DISCLOSURES 103-1; 103-2; 103-3	FURTHER COMMENTS
201-2	Helping the transition to a sustainable low carbon economy	ARA, p23, p28, p96-97 <u>Financing a green future together</u> <u>External Sector Statements</u>	
203-2	Building capability and digital skills	ARA, p12, p17, p20, p33	
203-2	Supporting businesses to start up and grow	ARA, p7, p27, p32 <u>HBP Plan</u>	
203-2	Helping people buy a home	ARA, p27, p32 <u>HBP Plan</u>	
203-2	Helping people save for the future	ARA, p27, p32 <u>HBP Plan</u>	
205-2	Governance and accountability	ARA, p30, p35, p65-67, p74, p90-93 <u>Reporting Centre, Group Statements</u> <u>Codes & Policies</u> <u>Responsible Business Committee Terms of Reference</u>	

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200: ECONOMIC TOPICS

GRI STANDARDS/DATE OF ISSUE OF STANDARD	RELATED MATERIAL TOPIC	RB REPORTING PREFERENCES 2019	BOUNDARY	FURTHER COMMENTS
201: Economic Performance 2016				
201-2	Financial implications and other risks and opportunities due to climate change	Helping the transition to a sustainable low carbon economy	ARA, p7, p28-32, p38 <u>Responsible Business Data Sheet 2019</u> p3 <u>Financing a green future together</u> <u>External Sector Statements</u>	Outside
203: Indirect Economic Impacts 2016				
203-2	Significant indirect economic impacts	Building capability and digital skills	ARA, p9, p27, p33 <u>Lloyds Bank UK Consumer Digital Index</u> <u>Lloyds Bank UK Business Digital Index</u> <u>HBP Plan 2014 – 2019 Performance</u> <u>HBP Plan – Digital Skills</u>	Outside
		Supporting businesses to start up and grow	ARA, p9, p27, p32 <u>HBP Plan – Businesses</u>	Outside
		Helping people buy a home	ARA, p27, p32 <u>HBP Plan – Social housing</u> <u>HBP Plan – First time buyers</u>	Outside
		Helping people save for the future	ARA, p27, p32 <u>HBP Plan – Helping people save</u>	Outside
205: Anti-corruption 2016				
205-2	Communication and training about anti-corruption policies	Governance and accountability	ARA, p25-26, p35, p163-164 <u>Responsible Business Data Sheet 2019</u> p2 <u>Fighting Fraud</u> <u>Our approach to Environmental, Social and Governance (ESG) topics</u> p21 <u>Anti-Bribery Policy Statement</u>	Inside See also GRI Standards 415-1 and 419-1 on page 09

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ENVIRONMENTAL

SPECIFIC STANDARD DISCLOSURES

300: ENVIRONMENTAL TOPIC MANAGEMENT APPROACH (MA)

RELEVANT GRI DISCLOSURES	RELATED MATERIAL TOPIC	RB REPORTING PREFERENCES 2019 MEETING MA DISCLOSURES 103-1; 103-2; 103-3	FURTHER COMMENTS
305-1	Helping the transition to a sustainable low carbon economy	ARA, p23, p28, p96-97, p162 Responsible Business Data Sheet 2019 p3	
305-2			
305-3			
305-4			

300: ENVIRONMENTAL TOPICS

GRI STANDARDS/DATE OF ISSUE OF STANDARD	RELATED MATERIAL TOPIC	REPORTING REFERENCES 2019	BOUNDARY	FURTHER COMMENTS	
305: Emissions 2016					
305-1	Direct (Scope 1) GHG emissions	Helping the transition to a low carbon economy	ARA, p96-97 Responsible Business Data Sheet 2019 p3	Inside	Selected environment data (energy, carbon, water, waste) are subject to Limited ISAE 3000 (revised) and ISAE 3410 assurance by Deloitte LLP for the 2019 Annual Responsible Business Reporting. 2019 ARA Independent Assurance Statement by Deloitte LLP to Lloyds Banking Group and the 2019 Reporting Criteria are available online.
305-2	Energy indirect (Scope 2) GHG emissions	Helping the transition to a low carbon economy	ARA, p96-97 Responsible Business Data Sheet 2019 p3	Inside	
305-3	Other indirect (Scope 3) GHG emissions	Helping the transition to a low carbon economy	ARA, p29, p32, p38, p96-97 Responsible Business Data Sheet 2019 p3	Inside and Outside	
305-4	GHG emissions intensity	Helping the transition to a low carbon economy	ARA, p96-97 Responsible Business Data Sheet 2019 p3	Inside	

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SOCIAL

SPECIFIC STANDARD DISCLOSURES

400: SOCIAL TOPIC MANAGEMENT APPROACH (MA)

RELEVANT GRI DISCLOSURES	RELATED MATERIAL TOPIC	RB REPORTING PREFERENCES 2019 MEETING MA DISCLOSURES 103-1; 103-2; 103-3	FURTHER COMMENTS
405-1 405-2	Equal opportunities, inclusion and diversity	ARA, p34 <u>Board diversity policy</u> <u>2019 Human Rights Policy Statement</u> <u>Inclusion and diversity</u>	
412-3 417-1	Responsible and ethical lending	ARA, p27-31 <u>First time buyers</u> <u>Supporting businesses</u> <u>Financing a green future</u> <u>External sector statements</u> <u>2019 Human Rights Policy Statement</u> <u>UNGC CoP</u>	
413-1	Vulnerable customers and financial education	ARA, p33 <u>Financial inclusion and education</u> <u>Community programmes</u> <u>Charitable Foundations</u>	
413-1	Community investment	ARA, p23, p26, p27, p33 <u>Community programmes</u> <u>Charitable Foundations</u> <u>Our approach to Environmental, Social and Governance (ESG) topics</u> p15	
415-1	Stakeholder engagement	ARA, p20-26 <u>2019 Materiality Summary</u> <u>Inclusion and diversity</u> <u>2019 Human Rights Policy Statement</u> p6, p11	
418-1	Customer privacy and data security	ARA, p26, p89, p91-92, p133, 138, p164 <u>Fighting fraud</u> Information and Cyber Security Policy (unpublished) Data Privacy Policy (unpublished)	
419-1	Governance and accountability	ARA, p25-26, p163-164 <u>Responsible Business Data Sheet 2019</u> p2 <u>Fighting fraud</u> <u>Our approach to Environmental, Social and Governance (ESG) topics</u> p21 <u>2019 Human Rights Policy Statement</u> p11	See also GRI Standard 205-2 on page 07

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400: SOCIAL TOPICS

GRI STANDARDS/DATE OF ISSUE OF STANDARD	RELATED MATERIAL TOPIC	RB REPORTING PREFERENCES 2019	BOUNDARY	FURTHER COMMENTS
405: Diversity and equal opportunity 2016				
405-1	Composition of governance bodies and employees	Equal Opportunities, Inclusion and Diversity <u>ARA, p34, p66-70</u> <u>Responsible Business Data Sheet 2019</u> p2 <u>Inclusion and diversity</u>	Inside and Outside	Selected diversity data are subject to Limited ISAE 3000 (revised) and ISAE 3410 assurance by Deloitte LLP for the 2019 Annual Responsible Business Reporting. <u>2019 ARA Independent Assurance Statement by Deloitte LLP to Lloyds Banking Group</u> and the <u>2019 Reporting Criteria</u> are available online.
405-2	Ratio of basic salary and remuneration of women to men	Equal Opportunities, Inclusion and Diversity <u>Gender Pay Gap Report 2018-2019</u>	Inside and Outside	
412: Human rights assessment 2016				
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	Responsible and ethical lending <u>2019 Human Rights Policy Statement</u> p9 <u>Equator Principles Table 2019</u> p1 <u>External Sector Statements</u>	Inside and Outside	Partial response for this indicator, reason for omission (under the terms of GRI Standards): we do not yet have verified data on total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening. In all sectors exposed to a heightened level of ESG risk, we aim to work with customers who: ➔ Implement effective, market-based solutions that take into account any social and environmental concerns about their operations ➔ Operate safely and securely within a defined framework that upholds human rights ➔ Align their operations with the principles of this framework and with the United Nations Global Compact's labour, environment and anti-corruption standards ➔ Assess the long-term impact of their activities across the entire supply chain, considering indigenous people and local communities specifically

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400: SOCIAL TOPICS

GRI STANDARDS/DATE OF ISSUE OF STANDARD	RELATED MATERIAL TOPIC	RB REPORTING PREFERENCES 2019	BOUNDARY	FURTHER COMMENTS	
413: Local communities 2016					
413-1	Operations with local community engagement, impact assessments, and development programs	Vulnerable customers and financial education	ARA, p26, p33 <u>Financial inclusion and education</u> <u>Charitable Foundations</u> <u>Tackling mental health issues</u>	Outside	
		Community investment	ARA, p27-33 <u>Community programmes</u> <u>Charitable Foundations</u> <u>Charity Partner</u> <u>Helping communities</u>	Outside	Selected community investment data are subject to Limited ISAE 3000 (revised) and ISAE 3410 assurance by Deloitte LLP for the 2019 Annual Responsible Business Reporting. <u>2019 ARA Independent Assurance Statement by Deloitte LLP to Lloyds Banking Group</u> and the <u>2019 Reporting Criteria</u> are available online.
		Stakeholder engagement	ARA, p23, p25 <u>Helping communities</u>		
FS14 (elective use of GRI G4 Sector Supplement)	Initiatives to improve access to financial services for disadvantaged people	Helping people buy a home	ARA, p33 <u>Financial inclusion and education</u>		
		Helping people save for the future	ARA, p27, p32 <u>Helping people save</u>	Outside	
		Vulnerable customers and financial education	ARA, p27 <u>Tackling mental health issues</u> <u>Financial inclusion and education</u>		
415: Public Policy 2016					
415-1	Political contributions	Governance and Accountability	ARA, p24, p162	Inside and Outside	We do not make any contributions to political parties, but we do engage regularly with UK Government bodies and regulatory bodies on relevant public policy
		Stakeholder Engagement	ARA, p24, p162	Outside	The Group engages with regulatory authorities and industry bodies on forthcoming regulatory changes, market reviews and investigations, ensuring programmes are established to deliver new regulation and legislation

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400: SOCIAL TOPICS

GRI STANDARDS/DATE OF ISSUE OF STANDARD	RELATED MATERIAL TOPIC	RB REPORTING PREFERENCES 2019	BOUNDARY	FURTHER COMMENTS
417: Marketing & Labelling 2016				
417-1	Incidents of non-compliance concerning product and service information and labelling	Responsible and ethical lending	ARA, p7, p26-27, p33, p37	Inside and Outside No record of non-compliance in 2019 regarding product and service information. No non-compliance in social banking operations.
418: Customer privacy 2016				
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Governance and accountability	ARA, p9, p91, p133 <u>Our approach to Environmental, Social and Governance (ESG) topics</u> p23	Inside and Outside
		Customer privacy and data security	<u>Responsible Business Data Sheet 2019</u> p2 <u>Customer complaints monitoring</u>	
419: Socio-economic Compliance 2016				
419-1	Non-compliance with laws and regulations in the social and economic area	Governance and accountability	ARA, p11, p26 <u>Modern Slavery & Human Trafficking Statement</u> p2, p11	Inside and Outside To the best of our knowledge, we have complied with all laws and regulations and therefore have not received any fines or sanctions this reporting year. Zero incidents of modern slavery reported through our Speak Up line.

Annex

Additional topics

Each additional topic – whilst not material in formal terms – is important on its own merits and to specific stakeholders. Therefore, information and data on each one can be found in our [Reporting Centre](#).

ADDITIONAL TOPIC	REFERENCE
BUSINESS PERFORMANCE AND GROWTH	ARA, p8, p36
INDIRECT ECONOMIC CONTRIBUTION	ARA p23, p32-33 HBP Plan Community programmes Charitable Foundations Responsible Business Data Sheet 2019 p1 Matched giving guidelines (unpublished)
RESPONSIBLE APPROACH TO RISK	ARA, p14, p30, p40, p42-46, p73, p78, p89
COLLEAGUE VOLUNTEERING	ARA, p3, p33, p93 Volunteering Volunteering standards (unpublished)
HEALTH & SAFETY	ARA, p26, p164 Responsible Business Data Sheet 2019 p2 Health and Safety Policy (unpublished)
COLLEAGUE TRAINING AND SKILLS	ARA, p19, p22, p26, p34 Tackling mental health issues Colleague Policy (unpublished) Code of Responsibility
SUPPLY CHAIN TRANSPARENCY	ARA, p25 Working with suppliers – Responsible sourcing Responsible Business Data Sheet 2019 p1 Modern Slavery & Human Trafficking Statement
SUPPORT FOR CHARITIES	ARA, p3, p7, p23, p27, p33, p93 HBP Plan Charity Partner

Finally, our Non-Financial Information Statement (ARA, p35), our [Reporting Centre](#), and our Responsible Business [Data Sheet](#) provide further information on human rights, materials, water, energy and waste is also provided for consistency, some of which is externally verified.