

SPEAK UP POLICY THIRD PARTY SUPPLIER POLICY SUMMARY

 <p>LLOYDS BANKING GROUP</p>	<p>SPEAK UP POLICY</p> <p>SUMMARY FOR THIRD PARTY SUPPLIERS</p>
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1.0 RATIONALE

Introduction

This summary for third party suppliers has been designed to support the creation of an environment where third party supplier employees feel safe to raise concerns. Speak Up is Lloyds Banking Group's whistleblowing programme, enabling colleagues (including all staff, contractors and third party employees) to report concerns in confidence and anonymously, if preferred. Speak Up promotes an open and honest culture within the Group and all colleagues (including third party supplier employees) will be supported for reporting a genuine concern, even if it is established as unsubstantiated. If you suspect or witness wrongdoing that impacts colleagues, customers or the Group, speaking up is the right thing to do.

Rationale

The purpose of this policy summary is to ensure all third party supplier employees are aware of how to report suspected wrongdoing relating to services provided to and on behalf of Lloyds Banking Group. This policy summary assists in managing the following high level risks:

- Failure to embed a culture where third party supplier employees feel safe to raise concerns in a confidential manner and are protected from reprisal.
- Failure to implement robust processes and procedures to ensure compliance with Speak Up legal and regulatory requirements.

In addition, this Policy has been designed to support compliance with the following legislation and / or regulations:

- Public Interest Disclosure Act 1998
- Financial Conduct Authority Handbook (SYSC) Chapter 18 and Policy Statement 15/24 Whistleblowing in deposit-takers and, PRA-designated investment firms and insurers.
- PRA Supervisory Statement 39/15 Whistleblowing in deposit-takers, PRA-designated investment firms and insurers.

1.1 SCOPE

This third party version of the Policy applies to all suppliers providing services to or on behalf of Lloyds Banking Group.

Third party suppliers operating outside the UK must ensure that local country and Jurisdictional legislation and / or regulatory requirements are adopted in addition to the requirements of this policy summary. Where there is a conflict, this should be discussed with the Supplier Manager and local risk team to agree the way forward. Local laws or regulations must take precedence.

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2.0 MANDATORY REQUIREMENTS – GENERAL

Third party suppliers are required to:

- Encourage their employees, either through annual training or refresher communications, to Speak Up if they suspect or witness wrongdoing, relating to services provided to and on behalf of Lloyds Banking Group.
- Provide examples of the types of concerns to be raised, distinguishing them from concerns relating to employment matters which should be dealt with via the suppliers own human resource's channels. Examples of wrongdoing include (please note this is not an exhaustive list):
 - Manipulating processes, procedures or systems to mislead others or Lloyds Banking Group, for personal financial gain, achieve product sales, targets, income or bonuses
 - Breaches of regulation or legislation, or concerns about a lack of openness with regulators
 - Concerns about behaviour that is impacting a team or multiple colleagues
 - Sexual harassment, racism or other illegal discrimination
 - Criminal activity such as theft, fraud, bribery, or tax evasion
 - Health and safety concerns
 - And other risks or malpractice that impact customers, colleagues or Lloyds Banking Group
 - Any attempts to conceal the above points.
- Through annual training or refresher communications, ensure their employees are aware of the routes available to report suspected wrongdoing, relating to services provided to and on behalf of Lloyds Banking Group, either directly to the Group, within the supplier's organisation/ sub-contractors or to UK Regulators.
- Ensure their new employees are made aware (either through induction training or a communication) within 8 weeks of starting employment, that if they suspect or witness wrongdoing, relating to services provided to and on behalf of Lloyds Banking Group, it should be reported. This must include details of how and where they can report concerns. In the event a contract term is less than 8 weeks, the training should be completed within the contract term.
- Provide the option for their employees to raise their concerns directly with the suppliers management (either a Line Manager or someone more senior in the business). All concerns reported to the supplier should be treated seriously and in a confidential manner.
- There should be no obstacles or attempts to prevent third party supplier employees from reporting a concern.
- Contracts of employment, non-disclosure agreements, settlement agreements and confidentiality agreements cannot prevent third party employees from reporting suspected wrongdoing.

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- Suppliers should make it clear that management inaction of reported concerns will not be tolerated and may be subject to formal action under the supplier's applicable disciplinary process.
- The harassment or victimisation of any third party employee reporting a concern must not be tolerated and may be subject to formal action under the supplier's applicable disciplinary process.

2.1 Reporting Concerns

- Third party suppliers should explain to their employees that they can raise a concern (confidentially) directly using any of the following options:

1. Report to Lloyds Banking Group's (LBG) Speak Up Service

If third party supplier employees feel unable or unwilling to report concerns to management within the suppliers organisation, Lloyds Banking Group operates a confidential Speak Up service where third party supplier employees can report their concern. Calls are handled independently from the Group and are not recorded. Employees do not need to be located in the UK to use this service and interpreters are available. Employees can contact the Speak Up service on:

- Phone: +44 (0)800 0141 053
- Non-UK toll free numbers are available in section 4.0
- Online: <https://lbgspeakup.ethicspoint.com>

The Speak Up service is managed by an external firm who are experienced in taking reports of suspected wrongdoing. All reports are taken seriously and the identity of those who raise a concern will be kept confidential. They will forward the details of the concern to the Group Conduct Investigations Team who will assess the need for an independent investigation.

Third party supplier employees should be aware that they can raise their concerns confidentially or anonymously. Anonymity means that the Group Conduct Investigations Team does not know your identity. Raising a concern confidentially means that the Speak Up service or Group Conduct Investigations are aware of your identity but will not reveal your identity to anyone else, without your consent, or unless required to by law (which is extremely rare). In such cases, we will discuss with you the most appropriate way to proceed.

Third party supplier management should explain employees do not need firm evidence of wrongdoing to report a concern. However, they must explain as fully as possible the circumstances they have witnessed. The more information provided, the more effective the investigation and the better chance of a positive outcome for Lloyds Banking Group and our customers.

2. Report to the Group Conduct Investigations Team within LBG:

Group Conduct Investigations is responsible for investigating, managing and overseeing colleague conduct related allegations across the Group.

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This includes concerns raised by employees of third party suppliers. Group Conduct Investigations will provide third party supplier employees with guidance and support to help determine if the circumstances they suspect or have witnessed require investigation. Management should make employees aware they can contact GCI via the following method:

- Email: speakup@lloydsbanking.com

Third party supplier employees should be made aware that all reports are taken seriously and the identity of those who raise a concern will be kept confidential.

3. Report Externally to Regulators

Third party supplier management should explain to their employees that concerns may be safely raised externally for example with the applicable regulator, whether employees are based in or outside the UK regardless of where the suspected wrongdoing is taking place. Concerns can be reported to a regulator at any stage and they do not have to be reported internally first. No attempt should be made to identify an employee who reports directly to a regulator.

Financial Conduct Authority:

- Phone +44 (0)207 066 9200
- Email: whistle@fca.org.uk
- Website : [Whistleblowing | FCA](#)
- Write to: Intelligence Department (Ref PIDA), The Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN

Prudential Regulation Authority:

- Phone: +44 (0)203 461 8703
- Email: PRAwhistleblowing@bankofengland.co.uk
- Website: [Whistleblowing and the Prudential Regulation Authority | Bank of England](#)
- Write to: Confidential reporting (whistleblowing) IAWB team, Legal Directorate, Bank of England, Threadneedle Street, London, EC2R 8AH.

2.2 Available Support

Third party supplier management should signpost support available to their employees. If they are uncertain about raising a concern, would like external confidential advice, or independent legal advice they can contact the **UK Whistleblowing charity, Protect**. Protect can talk through options and help them raise a concern about wrongdoing at work. You do not need to be located in the UK to use this service and interpreters are available.

- Phone UK Freephone: 020 3117 2520 (* option 1)
- Contact Protect Online using this [Web Form](#)

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2.3 Responding to Concerns

- Speak Up concerns must be dealt with confidentially by the third party supplier and employees must be offered protection in respect of the information provided in a Speak Up report wherever possible and in accordance with the law.
- As soon as management within a third party supplier are made aware of a Speak Up concern that has an impact on the Group and / or its customers, the supplier must ensure Group Conduct Investigations is informed via the Lloyds Banking Group Supplier Manager at the earliest opportunity to agree the best way to proceed.
- Third party supplier employees are expected to assist Lloyds Banking Group with any Investigations as required.
- In the event that the third party supplier is required to carry out any investigation, the supplier must ensure:
 - Adequate and appropriate resources (both in terms of competency and independence) must be available for dealing sensitively, promptly and effectively with Speak Up investigations.
 - Necessary action must be taken to ensure that investigations completed by the third party supplier are independent and no conflicts of interest exist.
- Records of allegations reported should be stored in an easily retrievable format and retained in accordance with the requirements set out in the Group Data Policy Summary for Third Parties.
- Where the supplier’s investigation of a Speak Up allegation identifies a weakness in the supplier’s controls or processes that has a significant regulatory or financial impact on Lloyds Banking Group, this must be reported to the Lloyds Banking Group’s Supplier Manager as soon as possible.

3.0 KEY CONTROLS		
Control Title	Control Description	Frequency
Reporting suspected wrongdoing	Suppliers must encourage employees to Speak Up if they suspect or witness wrongdoing, relating to services provided to Lloyds Banking Group, either through annual training or refresher communications. This must include details of how and where they can report concerns.	Annually

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Reporting suspected wrongdoing – new workers	The supplier must ensure new employees are made aware that if they suspect or witness wrongdoing, relating to services provided to Lloyds Banking Group, it should be reported, either through induction training or a communication within 8 weeks of starting employment or within the contract term if less than 8 weeks. This must include details of how and where they can report concerns.	Annually
All relevant investigations are reported.	When notified or investigating a Speak Up concern that has an impact on the bank, its customers and/or colleagues, the supplier must ensure the Group are informed via the LBG Supplier Manager.	Ad-hoc

4.0 Supporting Documents

[Speak Up International Toll Free Numbers](#)

5.0 MANDATORY REQUIREMENTS – NON-COMPLIANCE

Any material differences between the requirements set out above and the supplier’s own controls should be raised by the Supplier with Lloyds Banking Group’s Supplier Manager.

The Supplier Manager will then discuss the non-compliance with the Accountable Executive for the relationship and local risk team to agree the way forward.

Version Number	Effective Date
5.0	19 June 2018
6.0	1 July 2019
7.0	26 May 2020
8.0	14 June 2021
8.1	10 December 2021
8.2	15 June 2022