


## SPEAK UP POLICY THIRD PARTY SUPPLIER POLICY SUMMARY

 <p>LLOYDS BANKING GROUP</p>	<p style="text-align: center;"><b>SPEAK UP POLICY</b></p> <p style="text-align: center;"><b>SUMMARY FOR THIRD PARTY SUPPLIERS</b></p>
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### 1.0 RATIONALE

#### Introduction

Lloyds Banking Group expects its third-party suppliers to promote a culture where everyone feels comfortable to openly raise concerns with the person involved, line managers, or other leaders within the business. This policy summary is intended to support suppliers to promote a speak up culture and details how to report concerns relating to Lloyds Banking Group.

Speak Up is Lloyds Banking Group's whistleblowing programme, which enables individuals (including all employees, contractors and third-party staff) to report concerns in confidence or anonymously. If you witness or suspect wrongdoing, reporting it is the right thing to do.

#### Rationale

The purpose of this Policy is to assist in managing the following risk:

- Failure to manage concerns raised through whistleblowing and other reporting routes adversely impacts customers, colleagues or business operations.

In addition, this policy summary has been designed to support compliance with the following legislation / regulations:

- Public Interest Disclosure Act 1998
- FCA 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.
- Directive (EU) 2019/1937 ("Whistleblower Directive").

### 1.1 SCOPE

This third-party Policy summary 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.

Local laws and regulations must take precedence. This policy summary does not affect any legal obligations imposed on suppliers and does not exempt them from relevant implementation of applicable laws/regulations. Where there is a conflict, this must be discussed with the LBG Supplier Manager and local risk team to agree the way forward.

### 2.0 MANDATORY REQUIREMENTS

#### 2.1 Third-Party Supplier Responsibilities

## **SPEAK UP POLICY THIRD PARTY SUPPLIER POLICY SUMMARY**

This section outlines what arrangements third-party suppliers must have in place and communicate to their colleagues (2.1.1), and what arrangements must be in place to support the supplier's management/leadership to effectively respond to and/or escalate concerns (2.1.2).

### **2.1.1 Third-Party Supplier Colleague Awareness**

All third-party suppliers to Lloyds Banking Group must ensure the following is included in their internal policies, procedures and/or training. This must be communicated to all employees, workers, agents and key sub-contractors (together referred to as "colleagues") within 8 weeks of induction and annually thereafter.

- Encourage colleagues to Speak Up if they suspect or witness wrongdoing (including relating to services provided to and on behalf of Lloyds Banking Group).
- Colleagues do not need evidence of wrongdoing to report a concern but they must have reasonable grounds to believe that the information provided is true. Knowingly untrue allegations or those based on information for which there are no reasonable grounds to believe it is true, or reports made frivolously, maliciously or for personal gain, are not permitted.
- Examples of the type of concerns to be raised, distinguishing them from concerns relating to employment matters which should be dealt with via the suppliers own human resources channel. Examples of wrongdoing include (although this is not an exhaustive list):
  - Failure to comply with law, regulations, policies, procedures, or customer treatment standards
  - Inappropriate behaviour including any form of discrimination, harassment (including sexual harassment) or victimisation
  - Criminal activity such as theft, fraud, financial crime, bribery and corruption, or modern slavery/labour exploitation
  - Health and safety concerns
  - Damage to the environment or concerns about misleading customers or shareholders (e.g. 'greenwashing')
  - Other risks or malpractice that might impact customers, colleagues, or Lloyds Banking Group
  - Any attempts to conceal any of the above.
- The route(s) available to colleagues to report suspected wrongdoing within the supplier's management/organisation. Assurance that all concerns reported to a supplier will be treated seriously and in a confidential manner. It should also be 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.
- In case third-party colleagues do not feel able or willing to report their concerns to their management/organisation, they must be made aware that they can raise a concern directly to Lloyds Banking Group using any of the following options:

<b>Report to Lloyds Banking Group's Speak Up Service</b>	Lloyds Banking Group operates a confidential Speak Up service where third-party supplier colleagues can report their concern. All concerns are handled independently from the Group and calls are not recorded. Individuals do not need to be located in the UK to use this service and interpreters are available. They can contact the Speak Up service:
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**SPEAK UP POLICY THIRD PARTY SUPPLIER POLICY SUMMARY**

	<ul style="list-style-type: none"> <li>• Online: <a href="https://lbgSpeakup.ethicspoint.com">https://lbgSpeakup.ethicspoint.com</a></li> <li>• By phone: +44 (0)800 0141 053</li> </ul> <p>The Speak Up service is managed by an external firm, NAVEX Global, 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 send the details of the concern to LBG’s Group Conduct Investigations team who will assess the need for an independent investigation.</p> <p>Third-party supplier colleagues can raise their concerns confidentially or anonymously. Raising a concern confidentially means that the Speak Up service and 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 rare). In such cases, Group Conduct Investigations will discuss with you the most appropriate way to proceed unless not permitted to do so by law or this would jeopardise relevant investigations or proceedings. Anonymity means that the Speak Up service and Lloyds Banking Group will not know your identity.</p>
<p><b>Report to the Group Conduct Investigations Team within LBG</b></p>	<p>Group Conduct Investigations is responsible for investigating, managing and overseeing Speak Up concerns across the Group. This includes concerns raised by employees of third-party suppliers. Management should make employees aware they can contact GCI directly via:</p> <ul style="list-style-type: none"> <li>• Email: <a href="mailto:speakup@lloydsbanking.com">speakup@lloydsbanking.com</a></li> </ul> <p>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.</p> <p>If third-party supplier employees would like to raise a concern impacting or relating to the Group and/or its customers in a personal conversation, Lloyds Banking Group will organise – upon request – a personal meeting at the earliest opportunity.</p>
<p><b>Report Externally to Regulators</b></p>	<p>Third-party supplier management should explain to their colleagues that concerns may be raised with the regulator, no matter where they are based or where the suspected wrongdoing is taking place. Concerns can be reported to the below mentioned regulators (or any other competent regulator in the relevant jurisdiction) at any stage, and they do not have to be reported internally first. No attempt will be made to identify an employee who reports directly to a regulator.</p> <p><b>Financial Conduct Authority:</b></p> <ul style="list-style-type: none"> <li>• Phone +44 (0)207 066 9200</li> <li>• Email: <a href="mailto:whistle@fca.org.uk">whistle@fca.org.uk</a></li> <li>• Website: <a href="http://Whistleblowing   FCA">Whistleblowing   FCA</a></li> <li>• Write to: Intelligence Department (Ref PIDA), The</li> </ul>

## SPEAK UP POLICY THIRD PARTY SUPPLIER POLICY SUMMARY

	<p>Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN.</p> <p><b>Prudential Regulation Authority:</b></p> <ul style="list-style-type: none"><li>• Phone: +44 (0)203 461 8703 during office hours</li><li>• Email: <a href="mailto:whistleblowing@bankofengland.co.uk">whistleblowing@bankofengland.co.uk</a></li><li>• Website: <a href="#">Whistleblowing and the Prudential Regulation Authority   Bank of England</a></li><li>• Write to: IAWB (Legal Directorate), Bank of England, Threadneedle Street, London, EC2R 8AH.</li></ul>
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- Third-party colleagues must assist Lloyds Banking Group with any investigation as required.
- The signposting of the support available to third-party colleagues under Lloyds Banking Group's Speak Up policy. If third-party colleagues 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 discuss options and help them raise a concern about wrongdoing at work. Colleagues do not need to be located in the UK to use this service and interpreters are available.
  - UK Freephone: 020 3117 2520
  - Contact Protect Online using this [Web Form](#)
- Harassment or victimisation of any colleague reporting a concern is not tolerated and may be subject to formal action under the supplier's applicable disciplinary process.

### 2.1.2 Third-Party Supplier Management Awareness

Management/leadership of a third-party supplier firm must ensure the following measures are in place and documented:

- There are no obstacles or attempts to prevent third-party colleagues from reporting a concern including via contracts of employment, non-disclosure agreements, settlement agreements and confidentiality agreements.
- As soon as management within a third-party supplier is made aware of a Speak Up concern that has (or could have) an impact on the Group and / or its customers, the supplier must ensure Group Conduct Investigations is informed at the earliest opportunity to agree the best way to proceed. Usually this will be via the Lloyds Banking Group Supplier Manager, but management may also refer directly via the channels outlined in 2.1.1 (for example if there is a conflict of interest).
- Speak Up concerns impacting or relating to the Group and / or its customers must be dealt with confidentially by the third-party supplier, and supplier colleagues must be offered protection in respect of the information provided in a Speak Up report wherever possible and in accordance with local law/regulation.
- In the event that the third-party supplier is required to carry out an investigation impacting the Group and / or its customers, the supplier must ensure:
  - Competent and appropriate resources are available for dealing sensitively, promptly and effectively with Speak Up investigations.

## SPEAK UP POLICY THIRD PARTY SUPPLIER POLICY SUMMARY

- Investigations completed by the third-party supplier are independent and no conflicts of interest exist.
- Where the supplier's investigation of a Speak Up concern identifies a weakness in the supplier's controls or processes that has a significant customer, regulatory or financial impact on Lloyds Banking Group, this must be reported to Lloyds Banking Group as soon as possible.

### 3.0 MANDATORY REQUIREMENTS – NON-COMPLIANCE

Any material differences between the requirements set out above and the supplier's own arrangements must be raised by the Supplier with Lloyds Banking Group's Supplier Manager.

The Supplier Manager must then discuss the non compliance with the Accountable Executive for the relationship and local Risk team to agree 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
9.0	12 June 2023
10.0	08 July 2024
10.1	25 October 2024