Third Party Policy Changes

Previous and new policy names with key changes

Previous Name	New Name	Key Changes
Anti-Bribery Third Party Policy	Anti-Bribery (Economic Crime Prevention)	No key changes to the policy.
Anti Money Laundering Third Party Policy	Anti Money Laundering (Economic Crime Prevention)	No key changes to the policy.
Compliance Third Party Policy	Conflicts of Interest	Requirements have been moved out of the Compliance Policy to a standalone policy.
	Gifts, Entertainment & Hospitality (GEH)	An enhanced definition of GEH has been added to the policy, and requirements have been moved from the Compliance Policy to a standalone policy section.
	Market Conduct	Requirements have been moved out of the Compliance Policy to a standalone policy section.
	Regulatory Compliance	Requirements have been moved out of the Compliance Policy to a standalone policy section.
Customer Third Party Policy	Customer Conduct	The existing Customer and Product Policies have been amalgamated into a single Customer Conduct Policy. From a third-party perspective, there are no material changes; the changes within the policy predominantly affect LBG (e.g. changes to product governance and roles and responsibilities). Supplier responsibilities, including monitoring customer outcomes, have been made more explicit in the policy annex but have not fundamentally changed.
External Supplier / Sourcing & Supply Chain Management	External Supplier	Concentration risk assessment is now explicitly included as a requirement.

		General Termination – a new requirement ensuring that the termination of subcontractor arrangements is controlled. Resource Commitment – a new emphasis on making sufficient resources available for audit and assurance activities.
Fraud Third Party Policy	Fraud (Economic Crime Prevention)	No key changes to the policy.
Group Change Third Party Policy	Change Execution	No key changes to the policy.
Group People Third Party Policy	Colleague Conduct	No material change; restructured as a standalone policy and enhanced for clarity, with no additional requirements.
	Group People	The requirements relating to the Senior Managers Regime and colleague conduct can now be found in the separate 'Colleague Conduct' section. The Group People section is stronger in areas such as: • Responsible AI usage, • Human rights & ethical standards, • DE&I & employee protections, and • Governance and oversight expectations.
Group Data Third Party Policy	Data & Privacy	Modernised the policy through the following improvements: • Expanded scope from personal data and records to all data. • A new policy requirement has been included to restrict the training of supplier AI models without LBG approval.
Group Operational Risk Third Party Policy	N/A	There is no longer an Operational Risk Policy. The risk management expectations are now captured in the 'Being a Supplier to Lloyds Banking Group' section.
Group Payments Third Party Policy	Payments & Transaction Execution	The previous policy focused on compliance with regulated payment services in the UK, EEA or Crown Dependencies (CD) within the scope of the UK Payment Services Regulations, EU Payment Services Directive and the equivalent regime applicable in the CD. It applied only to suppliers providing services that fell within the scope of these regulations. The scope of the new Payments & Transaction Execution Risk Policy is wider than just compliance with the above regulations and applies

		where any transaction (defined as a transfer of money or assets) takes place.
Minimum Security Standards Third Party Policy	Cyber & Information Security (Including Physical Data Security)	The previous principles-based internal Security Policy has been replaced with a new Cyber & Information Security (Including Physical Data Security) Risk Policy, which provides outcome-focused control requirements. Third-party requirements have been updated to align with it. The C&I Security chapter of the omnibus policy replaces the Lloyds Banking Group Third Party Supplier Security Standards, which our suppliers must follow to safely and securely do business with Lloyds Banking Group. These changes do not introduce new security expectations on the Group's suppliers.
Operational Resilience Minimum Standards Third Party Policy	Business Continuity	The Business Continuity Policy replaces the Operational Resilience Minimum Standards. Obligations are grouped by criticality of the service being provided to LBG.
Remuneration Third Party Policy	Remuneration	No key changes to the policy.
Sanctions Third Party Policy	Sanctions (Economic Crime Prevention)	No key changes to the policy.
Speak Up Third Party Policy	Speak Up	No material change — the revised summary consolidates and clarifies existing supplier Speak Up requirements and does not introduce any new requirement.
Technology Third Party Policy	IT Systems	IT Training – Expectations for IT colleagues to receive tailored technology education and awareness. Terminology changes have been made in the policy; for example, references to Currency have been removed, with the requirements moved under Asset Management. The Technology Policy has been replaced with the IT Systems Risk Policy.

Group Health, Safety & Fire Third Party Policy	Health, Safety, Personal Security & Premises	No material change — the new version consolidates and clarifies supplier health & safety expectations without introducing any new requirements.
N/A	Model Risk	New
N/A	Financial Reporting & Tax	New
N/A	Client Assets	New

Version Control

Version	Publication Date	Changes
1.0	July 2026	Initial creation of the document.