The way we do business is based on our values.

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Our Vision is to be recognised as the best bank for customers.

We believe that we can make our greatest contribution to society by helping Britain prosper, and that means serving the financial needs of UK families, businesses and communities in a responsible way.

Using input from external experts and colleagues across the Group we have developed our Code of Personal Responsibility and Code of Business Responsibility so that each of us can demonstrate our commitment, as individuals and as a business, to operating responsibly.

We expect all colleagues to live up to the Codes of Responsibility, and we take any non-compliance with the codes very seriously. We acknowledge that we won’t always be perfect and there will be occasions when we get it wrong. When this happens, we commit to putting things right as quickly and fairly as possible.

We can only be the Best Bank for Customers by building a great reputation founded on the highest standards of responsible behaviour. The Codes of Responsibility will guide our decision-making and help us put into practice our commitment to strive to always do the right thing.

“On behalf of the Board, I strongly endorse and fully support the Codes of Responsibility. The way that business is conducted has never been more important.”

Anita Frew, Group Non-Executive Director and Chair of the Responsible Business Committee
CODE OF BUSINESS RESPONSIBILITY
INTRODUCTION

OUR CODE OF BUSINESS RESPONSIBILITY DEFINES WHAT WE WANT TO BE KNOWN FOR AS AN ORGANISATION AND HOW WE OPERATE.

We have drawn inspiration from our Group Values in developing this Code of Business Responsibility and the five pillars of responsible business that underpin it. Our Group Values, which are Putting Customers First, Keeping it Simple and Making a Difference Together, guide the way we behave and give us standards to measure ourselves by – particularly in our interactions with customers, colleagues and communities.

Our five pillars of responsible business are consistent with our Values to define how we operate as an organisation and set out what people can expect when banking with, coming to work for, or doing business with, Lloyds Banking Group. They are the foundations of what we aspire to demonstrate in everything that we do.

Our five pillars of responsible business are:
1. We put customers at the heart of our business.
2. We aim to be a great company to work for.
3. We work responsibly with our external stakeholders.
4. We invest in communities to help them prosper and grow.
5. We work to continually reduce environmental impact.

We have also developed a Code of Personal Responsibility which, along with the Code of Business Responsibility (together, the Codes of Responsibility), underpins our Group Ethics Policy. The Code of Personal Responsibility has been designed to provide guidance and support to colleagues for making decisions and carrying out their work in a way that is compatible with the Group’s Values.

We believe that these Codes of Responsibility will foster and strengthen a corporate culture that will help us to deliver against our Values and our five pillars of responsible business. Through this, we can make a real difference to customers, communities and colleagues and achieve our vision of being recognised as the best bank for customers.
What do colleagues need to do?

All colleagues and those acting on behalf of, or representing, Lloyds Banking Group (such as contractors, consultants, and other service providers) are required to adhere to the Codes of Responsibility, and confirm, on an annual basis, that they understand them. Compliance with these Codes of Responsibility helps all colleagues to contribute towards the delivery of our Group Values and five pillars of responsible business.

Colleagues are expected to adhere to the Codes of Responsibility in conjunction with our Personal Integrity Policy, Ethics Policy and our other Group Policies (see Useful Links).

All colleagues and those acting on behalf of, or representing, Lloyds Banking Group are expected to adhere to the Codes of Responsibility and are required to:

1. Take time to understand the Codes of Responsibility and how they apply to their role.
2. Operate in line with the Codes of Responsibility in all aspects of their role.
3. Challenge others when they are not operating in line with the Codes of Responsibility. If necessary escalate to a Line Manager, a Senior Leader in their business area, HR Advice and Guidance or the Whistleblowing Line.

We expect all colleagues and those acting on behalf of, or representing, Lloyds Banking Group to speak out if they have any suspicion of inappropriate behaviour which violates the standards set out in this Code of Business Responsibility (see Help, Advice & Guidance section). We provide mechanisms to facilitate disclosure if a colleague is unable or unwilling to inform their line management and will thoroughly investigate all genuine reports. Furthermore, Lloyds Banking Group does not tolerate any form of retaliation against colleagues or third parties who have made reports, in good faith, of threatened, ongoing, past or suspected violations of this Code of Business Responsibility.

We acknowledge that some parts of the Group may refer to customers as ‘clients’; for the purpose of this document all customers/clients are referred to as customers. We also recognise that for many colleagues, for example in parts of IT or HR, their immediate customers may be other colleagues and so, where relevant, ‘customer’ can mean colleagues or customers. We also recognise, however, that for every colleague, our ultimate customers are the people and businesses who depend on us every day for their banking and other financial services, and we must ensure that we always consider them in our day-to-day roles.

Lloyds Banking Group is an initial signatory to the Chartered Banker Professional Standards Board (CB:PSB). As part of our ongoing commitment to professionalism in banking we subscribed to the CB:PSB Code of Professional Conduct and have embedded the requirements in both our Code of Business Responsibility and our Code of Personal Responsibility. More information on the CB:PSB and its Code of Professional Conduct can be found here.

In addition, we have implemented the Chartered Banker Foundation Standard for Professional Bankers. The Foundation Standard consists of a set of indicators that assess professional knowledge, skills, attitudes and behaviours. Our internal training, assessment and performance management approaches have been benchmarked against the Foundation Standard, and over 50,000 customer facing colleagues across the Group have been reviewed against the criteria.

As a result, Lloyds Banking Group has the largest workforce in the UK banking industry to achieve the Foundation Standard.

To ensure the content is current, the Codes of Responsibility will be reviewed on an annual basis. Queries or comments can be shared at any time by emailing Responsible.Business@Lloydsbanking.com

To access a copy of the Codes of Responsibility suitable for sharing with people outside the Bank, please visit www.lloydsbankinggroup.com and download the Codes of Responsibility from within the ‘Responsibility’ section.
1. Responsible Business Pillar 1: We put customers at the heart of our business

Our Group is at the heart of communities, serving the financial needs of over 30 million customers in the UK and abroad. That is a great responsibility and one that we take very seriously. We want to help Britain prosper by being the Best Bank for Customers, meeting all of their financial needs and helping them succeed financially.

We are continuing to invest in our vision to be the Best Bank for Customers. This covers all aspects of our conduct with customers, through the lifecycle of their relationship with us, to ensure that we put the customer at the heart of every decision-making process, and deliver fair outcomes for them at every stage.

Our Group has a conservative business model embodied by a risk culture founded on a prudent approach to managing risk where colleagues are accountable for the risks they take and where the needs of customers are paramount. The focus remains on building and sustaining long-term profitable relationships with customers whatever the economic climate.

We aim to treat customers fairly and ensure we are transparent in all our dealings with them. We conduct regular monitoring to check we are meeting our high customer service standards and linking our colleagues’ remuneration to customer outcomes. We believe that consumers benefit from healthy competition between providers of financial services and we compete vigorously and fairly, striving to offer excellent service and competitive products which meet the needs of our customers. We rigorously test all new and existing products to ensure they are as simple and transparent as possible and will only sell those that meet a satisfactory standard. We have zero appetite for systemic unfair customer outcomes arising from product design, sales or after-sales processes.

We take responsibility for making sure our customers are aware of the Financial Services Compensation Scheme (FSCS) and the protection this provides for them.

For colleagues only, information on the FSCS can be found here.

We also work with consumer and business groups to improve our offering to customers. When we do receive complaints, we take these very seriously, and ensure they are dealt with quickly, fairly and consistently.

We seek to play a full role in supporting the economy by providing households and businesses with access to affordable and responsible credit. We are committed to supporting business from start-ups through to larger corporates by providing access to credit and the wider support necessary to help them grow and prosper. Our SME Charter details specific commitments for support to SMEs, which we recognise are the lifeblood of the economy. More information can be found on our Lloyds Bank and Bank of Scotland Business Banking websites.

At the same time, as a responsible lender, we seek to ensure that we lend to customers who can afford to repay their borrowing and to businesses that have a fundamentally sound business model. If customers face financial difficulties at some point, we seek to proactively identify and support these customers and find ways in which we can help. We also provide financial support to independent money advice and debt charities to provide customers with alternative access to advice and help.

We also recognise our responsibility to help tackle financial exclusion. We invest in products and services that increase access to banking and credit and help bring excluded groups into mainstream financial services, while at the same time developing consumers’ financial literacy and understanding.

We take protecting our customers and their assets extremely seriously and invest in activities to deter, detect and prevent financial crime.

Our approach to Conduct underpins the way in which we treat all our customers, whichever part of our business they deal with, so that we deliver consistently across the Group. Our ambition is to lead the industry on conduct, in delivering fair outcomes for customers through everything we do. By doing this, we will become the Best Bank for Customers.
2. Responsible Business Pillar 2: We aim to be a great company to work for

We seek regular feedback from colleagues through our Groupwide Colleague Engagement Survey and are committed to acting upon that feedback to enable us to continue to be a great place to work.

There are many aspects of being a great company to work for including:

a. Diversity & Inclusion

We aim for our workforce to reflect the diversity of the communities we serve. We recognise that by understanding and valuing difference, we can build trusted relationships with our customers, colleagues and communities. Leaders throughout the business are encouraged to set an example by behaving in line with the Group’s Values and demonstrating their commitment to diversity and inclusion.

b. Human Rights

We aspire to conduct business in a way that values and respects the human rights of our colleagues, customers and those of the communities in which we operate. We adhere to the rules and regulations of every country we operate in, as well as conforming to the United Nations Declaration of Human Rights together with the International Labour Organisation (ILO) Fundamental Conventions.

In addition we are a signatory, and seek to conform to, the Equator Principles (EPs), which is a credit risk management framework for determining, assessing and managing environmental and social risk in project finance. We understand that human rights encompasses more than just the individual and therefore takes into account social, ethical and environmental issues in our investment, lending and service operations. If we are found to infringe the United Nations Declaration of Human Rights, International Labour Organisation (ILO) Fundamental Conventions or Equator Principles, we will take the actions necessary to mitigate the violation as swiftly and effectively as possible.

c. Behaviour at Work

We aspire to treat others as we would like to be treated. We aim to provide a working environment which is free of discrimination, harassment, bullying or victimisation of any kind. In all aspects of employment, we aim to treat individuals fairly and with respect, ensuring equality of opportunity. We do not tolerate abusive or discriminatory behaviour in any form, or for whatever reason, in any of our business operations.

d. Disputes, Grievances and Redundancy

We have clear and robust procedures for disputes and grievances and ensure that appropriate structures are in place to facilitate constructive dialogue, involving recognised trade unions where appropriate.

Where colleagues leave the organisation through redundancy, we offer several support mechanisms – including an external, independent career support supplier – to help provide them with an opportunity to review their individual skills, strengths and achievements and to discuss their next steps.

We also support colleagues’ rights to exercise freedom of association and the Group has extensive collective bargaining processes in place across the Group – both in the UK and overseas. We have agreements with four trade unions who collectively negotiate and consult on behalf of most colleagues in the Group.

e. Reward

We offer colleagues a competitive reward package that underpins a culture of performance and aims to strike the right balance between reward, risk management and performance. As described in the ‘Pay and Bonus’ section, our approach to remuneration is developed with input from both our shareholders and our regulators.

Pension schemes form an important element of colleagues’ remuneration. Our pension schemes are operated independently of the Group and we work to ensure they are properly supported and funded over the long-term.

f. Training & Development

We ensure that colleagues receive appropriate training and development
for their roles and provide opportunities for them to develop their professional knowledge and skills. We recognise that this is crucial in developing and retaining talented individuals, and building a high performance organisation.

g. Health & Wellbeing
We seek to enable colleagues to achieve a positive balance between their work and their lives outside of work and provide a number of opportunities, such as flexible working, to help them do this.

We work to safeguard and promote colleague wellbeing, by ensuring a psychologically-sound working environment to help prevent work-related illness and by providing support and health advice in times of need.

We are committed to achieving the highest standards of health and safety and fire protection for our colleagues, customers and anyone who visits our premises. Colleagues are responsible for taking reasonable care for the health and safety of themselves and other people (e.g. visitors, customers and contractors).

3. Responsible Business Pillar 3:

We work responsibly with our external stakeholders

a. Shareholders
We keep shareholders informed of the strategy and financial performance of the Group.

We ensure that our public communications include fair, honest, accurate, timely and transparent disclosure.

We comply with the provisions of the Stock Exchange listing rules, including those relating to corporate governance best practice.

We prepare financial statements for each accounting period which give a true and fair view of the Group.

We maintain balance sheet and financial ratios compatible with the long-term stability and continuity of the business, operating at all times within prudent limits of exposure to credit risk, interest rate movements, foreign exchange fluctuations and liquidity, operations and insurance risks.

We buy and sell currencies and financial instruments for customers and trade for our own account only within strictly defined limits approved by the Group Board and regulatory authorities under whom we operate around the world.

b. Responsible financial relationships
We provide finance to companies and other organisations around the world which can be exposed to environmental, ethical and social risks. To safeguard our business and our reputation, we work to manage these risks effectively and responsibly. Where we become aware of an organisation whose operations cause us concern, we will review the situation in line with our prudent approach to managing risk.

We seek to avoid financing activities that are prohibited by international conventions supported by the UK government.

Where we finance industries with inherent social and environmental risks – such as mining, oil and gas, power generation, construction, chemicals and forestry – we take account of the risks, and support their efforts to manage them effectively.

The Group is also a signatory to the UN Principles of Responsible Investment. The Principles aim to encourage the consideration of environmental, social and governance issues into decision-making and investment decisions.

c. Suppliers
We work closely with suppliers to access and best use their expertise in developing innovative and quality products and services and to effectively manage risk.

Our external suppliers are very important to us as they enable us to provide the best products and services to our customers. We engage with our suppliers, and the wider supply market, in a way that adds mutual value. This is a key part of the Lloyds Banking Group sourcing approach which has been developed to ensure we gain the best value for our customers across price, quality and social impacts.
We build strong, collaborative relationships with our suppliers and engage in regular dialogue to help them understand the environment in which we operate and to ensure our needs, and those of our customers, are effectively met. This enables us to drive continuous improvement and innovation in our supply chain and to effectively manage risk.

We consider our suppliers’ social, ethical and environmental performance as a standard part of our sourcing process and we are also a signatory to the Prompt Payment Code which requires us to provide clear guidance on payment procedures and encourage similar good practice amongst our suppliers.

d. Regulators

We have a zero appetite for regulatory breaches and aim to meet the regulatory, legal and tax requirements in all the jurisdictions in which we operate. We aim to lead industry best practice. When regulations change, we respond as swiftly as possible to ensure we maintain our compliance. If local laws where we operate are less restrictive than our own standards, we will always follow our own standards where it is appropriate and legal to do so.

In the UK we are regulated by The Financial Conduct Authority (FCA) and The Prudential Regulation Authority (PRA) and our customers have recourse to the Financial Ombudsman Service where applicable - click here to access their website.

We subscribe to the Lending Code and the Finance and Leasing Association’s Code of Practice.

e. Government

We engage regularly with the UK Government, the European Commission, the European Parliament and other bodies to assist in the formulation of public policy around consumer issues, financial inclusion and financial education and financing the green economy.

We produce economic and social research that champions consumer interests such as the Halifax House Price Index, which is used to inform Government policy.

We are a signatory to the EU Transparency Register and comply with its Code of Practice.

f. Media Relations

We employ as open a policy as possible when dealing with all media enquiries.

We are always truthful and accurate to the fullest extent in all of our responses and interactions with the media.

We take into account the concerns of the wider community, such as financial wellbeing, community investment requirements and environmental concerns. Through collaboration with industry groups, we use our influence as a leading business to support and encourage responsible and ethical business practices.

Our community investment strategy is focused on supporting activities with outcomes that result in education, employability and enterprise. This is where we believe, as a bank, we can have the most impact to help Britain prosper. Our overall activities and programmes include providing funding for local charities, community sponsorship, support for colleagues’ volunteering, mentoring and fundraising activities. Our key strategic programmes are designed to support societal needs such as improving levels of financial inclusion and literacy, particularly amongst vulnerable groups; helping with the creation of jobs through providing funds to support the start up and scale up social enterprise, as well as opening doors for young people from families who might not have the backing to attend leading universities. We are one of the biggest investors in UK communities.

4. Responsible Business Pillar 4: We invest in communities to help them prosper and grow

We are committed to making a sustained, positive contribution to the communities in which we operate. Our main contribution to society is our direct economic impact, as a bank providing individuals and businesses with finance to help them prosper and grow, as a major employer and as a purchaser of goods and services. This is supported by our active investment in communities and our community giving programme.

We recognise that our lending and investment activity has a major impact on communities.

Our community investment strategy is detailed in our Responsible Business Report, which is available here.
5.

Responsible Business Pillar 5: We work to continually reduce environmental impact

We have an important role to play in facilitating and financing the transition to a more sustainable, low-carbon, resource efficient economy through our own business and through our financial relationships.

We aim to be as efficient as possible in our use of resources and focus action on energy, travel, waste, water, paper and buildings.

We educate and motivate our colleagues to conduct activities in an environmentally responsible manner and we encourage our business partners, suppliers and contractors to do the same.

We recognise that accurate measurement of our environmental impact is critical if we are to manage our resources efficiently. We seek to continually improve our systems and processes to achieve this and our environmental data is reviewed annually by an external auditor.

We engage our key stakeholders, including colleagues and communities, in dialogue on our environmental programme and monitor our performance against best practice to ensure continuous improvement.

We seek to comply with the spirit, as well as the letter of applicable environmental laws and regulations with regards to the environment. Where none exist, we set ourselves appropriately high standards.

We take account of environmental risks in our lending and investment businesses and actively seek to provide finance to enable the transition to a more environmentally sustainable economy.

Our environmental standards apply to all locations and aspects of our business.

We promote high ethical standards and have a zero appetite for circumvention of our fraud and financial crime policies. Our colleagues are required to demonstrate honesty and integrity in everything they do. We do not condone, under any circumstances, the offering or receiving of bribes or any other form of improper payments. Our colleagues are supported in doing this by regular training to develop their understanding of financial crime risks.

We operate systems and controls designed to ensure that our products and services are not abused for the purposes of laundering the proceeds of crime, or for facilitating terrorism or breaching sanctions legislation. The Group is subject to a number of anti-money laundering laws contained in several different Acts. The law applies to both our business and each of our individual colleagues. We must also comply with the FCA requirements in respect of the management of Financial Crime.

We respect the traditions and cultures, and obey the laws, rules and regulations, of every country in which we operate.
2. Gifts and Improper Payments
We allow the giving or receiving of any benefit, gift, entertainment or hospitality by, or to, the company or our colleagues, only in specific circumstances which are allowed by the Group’s Conflicts of Interest Policy. An example of such a circumstance is where this is in the course of normal, local, business entertainment or where the giving and receiving of reasonable gifts and tokens cannot be construed as improperly influencing the business relationship. All gifts, entertainment and hospitality received or given must be recorded in a gift register which will be maintained for 10 years and reviewed at an appropriate frequency.

3. Conflicts of Interest
We ensure that information received in the course of our business dealings is not used inappropriately for corporate or personal gain or any other purpose except that for which it is given. Monitoring is undertaken to ensure that the Group’s activities and the personal and financial interests of our colleagues do not contravene the Group’s Conflicts of Interest policy.

4. Market Abuse
We have a Market Abuse and Personal Account Dealing Policy which is aligned with the UK’s market abuse legislation. Market abuse, such as trading on the basis of ‘inside information’, is a criminal offence in the UK, US and many other countries. Colleagues are personally responsible for ensuring that they comply with this policy and do not abuse the market. We have monitoring systems in place for the detection of instances of market abuse and procedures to ensure that any detected instances are dealt with swiftly and effectively. This includes procedures to identify and report suspicious transactions where relevant.

5. Pay and Bonus
We work closely with our regulators and our major shareholders to ensure our remuneration strategy is aligned to prudent risk management. We consult them on a regular basis and develop our approach with their input. Our remuneration strategy seeks to strike the right balance between shareholders’ views on remuneration and the need to attract, incentivise and retain the right people. Total base salary costs form the largest proportion of total colleague remuneration.

All colleagues, including the Group Chief Executive, are assessed against a Balanced Scorecard that explicitly includes risk management, as a component of their overall performance. Business Executives have specific risk management objectives, and incentive schemes take account of performance against these. Colleagues’ performance is reviewed at least twice a year and they are assessed by a combination of how they have performed against their objectives, and how they have performed against our Group Values, Behaviours and Codes of Responsibility.

6. Intellectual Property
We must ensure that we not only protect our brands, designs and inventions, but we also respect the Intellectual Property rights of others. Intellectual Property includes all patents, trademarks, design rights, copyright or other know-how owned by Lloyds Banking Group. By protecting our Intellectual Property, we can ensure that the value of our brands is maintained. Also, it helps us to provide customers with new products and services and develop new processes, software and systems to improve our business.

7. Confidentiality and Data Protection
We expect all colleagues to act in a professional, ethical and sensitive manner when dealing with confidential information, to ensure that confidentiality is maintained. Failure to observe the proper standards of conduct will be treated as a serious disciplinary offence and may result in civil or criminal penalties.

8. Communication
We uphold the integrity and reputation of the Group through factual and appropriate communications, whether written or verbal, which relate to or could be associated with the Group, for example through Social Media.

9. Political Activity
Colleagues have the right to participate as an individual in political activities. However, these activities are conducted as an individual and not as a representative of Lloyds Banking Group.

It is Lloyds Banking Group’s policy not to make political donations (as defined in the Companies Act 2006). We avoid participating in any activity which we have reasonable grounds to believe does not fall within the scope of the Companies Act 2006.
10. Tax
We manage our tax obligations to ensure full compliance with all statutory requirements and we ensure that our tax reporting is in accordance with all applicable accounting standards.

We manage our tax affairs within our risk appetite to keep the bank safe, support sustainable business growth and minimise losses. This means balancing the interests of our stakeholders and protecting the reputation of the Group. In particular:

a. We do not enter into transactions whose sole purpose is to minimise or reduce tax cost.

b. We act in accordance with HMRC’s Code of Practice on Taxation for Banks and are open and transparent in our dealings with the tax authorities.

11. Competition Law
We have a zero appetite for breaches of competition law and we do not become involved in agreements or practices to prevent, restrict or distort competition (such as exchanging commercially sensitive information with competitors or unlawfully fixing prices).

We do not seek to gain unfair advantage over our competitors, actual or potential, or to unfairly exclude them from the market.

We recognise that competition law is not intended to stifle legitimate business. If we are in doubt about whether a proposed agreement, project or strategy complies with competition law, we seek advice beforehand from a competition specialist.

We believe that consumers benefit from healthy competition between providers of financial services and we compete vigorously and fairly, striving to offer excellent service and competitive products which meet the needs of our customers.

We require colleagues to evidence that they understand the requirements of the Code of Business Responsibility, on an annual basis.

Failure to comply with this Code of Business Responsibility, the Code of Personal Responsibility, the Personal Integrity Policy, the Ethics Policy or any of our other Group Policies, regulations or codes of conduct laid down by external authorities (e.g. the Regulators, British Bankers Association, Association of British Insurers) may result in severe consequences for Lloyds Banking Group and/or its employees. This may, therefore, constitute grounds for disciplinary action, which could potentially include dismissal or, in some circumstances, criminal prosecution.

For Lloyds Banking Group Colleagues Only:
All colleagues are required to review and comply with all of the Group Policies which are relevant to their roles. The Group Policy framework is published on Interchange and can be accessed by clicking here.

Further information on underlying HR Policies can be accessed on Interchange by clicking here.
If you believe that you have witnessed something which contravenes the standards of personal or business conduct outlined in this Code of Business Responsibility, the Code of Personal Responsibility, our Personal Integrity Policy or our other Group Policies, you must discuss this with someone via one of the routes below:

1. Your first port of call should be your Line Manager (who is the person you report to on a day-to-day basis).
2. If you are unable or unwilling to speak to your Line Manager, you should speak to another Senior Leader in your business area, such as your Line Manager’s manager.
3. If none of these options are possible or you feel your concerns are not being addressed by your Line Manager, you should raise your concerns through HR Advice and Guidance or the Whistleblowing Line. The Whistleblowing Line provides colleagues with a mechanism for expressing their concerns about wrongdoing in the workplace. All concerns raised are taken seriously and fully investigated. The identity of colleagues who raise a concern will be kept confidential, and no colleague will be discriminated against in any way as a result of raising an issue. Please see the Whistleblowing FAQ for more information.

For Lloyds Banking Group Colleagues Only:

Colleagues should read the ‘Guidance on How to Make a Whistleblowing Report’ before contacting the Whistleblowing Line to ensure the report is made correctly. Reports can be made by email, phone or web based. Contact details can be found on Interchange by clicking here. Mandatory training on Whistleblowing is available internally to all colleagues.

Useful Links

1. [Code of Personal Responsibility](#)
2. [Lloyds Banking Group annual Responsible Business Report](#)
3. For Lloyds Banking Group Colleagues Only:
   a. Colleagues are required to review and comply with all of the Group Policies which are relevant to our roles. To access the Group Policy framework on Interchange click here.
   b. Further information on HR Policies, including the Personal Integrity Policy, and contact details for HR Advice and Guidance can be accessed on Interchange here.

Contact Us

We value your feedback and although the Code of Business Responsibility will be reviewed on an annual basis, you can share any queries or comments at any time by emailing us at Responsible.Business@Lloydsbanking.com
1. Why do we have both a Business and Personal Code of Responsibility?
Our Code of Business Responsibility gives an overview of how Lloyds Banking Group, as an organisation, conducts responsible business on a day-to-day basis, whereas the Code of Personal Responsibility is about how each and every colleague is expected to conduct themselves. Each of us has a part to play in shaping a culture based on our Group Values at Lloyds Banking Group and the Code of Personal Responsibility will help us to achieve this. It is important that colleagues adhere to and understand both Codes of Responsibility as any behaviour which goes against the Codes of Responsibility may result in disciplinary action.

2. What are my responsibilities with regards to adhering to the Codes of Responsibility?
You are required to review the Codes of Responsibility each year as part of the Mandatory Training curriculum. Once you have completed the training, it is expected that you understand your responsibilities under both Codes of Responsibility, and adhere to them every day.

3. What will happen if I don’t act in accordance with either of the Codes of Responsibility?
If you do not operate in accordance with the Codes of Responsibility, or the Personal Integrity Policy, depending on the circumstances, you may be subject to disciplinary procedures.

4. Can I share the Codes of Responsibility with my stakeholders who are not employed by Lloyds Banking Group?
Yes. Both Codes of Responsibility have been designed so they are suitable for sharing with our external stakeholders.

5. A customer has complained that Lloyds Banking Group has not acted in accordance with our Codes of Responsibility - what should I do?
You should first ensure that you understand exactly which part of the Codes of Responsibility the customer is referring to and should treat the complaint as you would any other complaint. You are then advised to speak to your Line Manager who will engage the necessary teams within the Group for support where necessary, such as Group Legal or Group Risk.

6. I am unsure about the correct course of action to take to resolve an issue I have and need to make a quick decision – what can I do?
If a situation arises where you would like some guidance as to the correct course of action to take, you should refer to the Decision Guide within the Code of Personal Responsibility as this will prompt you to ask yourself some key questions before you proceed. You should also speak to your Line Manager who will be able to offer further guidance.

7. I have read the Codes of Responsibility and reviewed our Group Policies but I am still not sure on what the right course of action is - what should I do?
If a situation arises where, despite reviewing both Codes of Responsibility and the relevant Group Policies, you remain unsure of the right course of action, you must speak to your Line Manager or another Senior Leader in your area for guidance.

8. I am concerned that a colleague is not acting in accordance with the Codes of Responsibility and have raised this with my Line Manager, but I do not feel that they are fully addressing my concerns - what should I do?
If you are concerned that a colleague has broken, or is about to break, the Codes of Responsibility, and you feel your concerns are not being suitably addressed by your Line Manager, you should speak to another Senior Leader in your area. If you still feel uncomfortable, you can call HR Advice and Guidance or the Lloyds Banking Group Whistleblowing Line. (For Lloyds Banking Group Colleagues Only: More information on Whistleblowing can be found on the Interchange by clicking here.)
I have followed regulatory requirements to resolve an issue with a customer but they are still not happy and have made a complaint to the Financial Ombudsman Service. I am concerned that I may be disciplined for not having fulfilled all of the Code of Personal Responsibility commitments under Putting Customers First but I did not feel I had a choice - will I be disciplined?

Situations will arise when you may feel that you are breaking the Codes of Responsibility because you are following a regulatory procedure which doesn’t appear to be in line with our Group Value of ‘Putting Customers First’. You must always follow regulatory procedures and if you feel this means that you are breaking the Codes of Responsibility, you should talk to your Line Manager for guidance.

I do not deal directly with customers, so do the sections in the Codes of Responsibility which refer to ‘customers’ still apply to me?

Yes. The Codes of Responsibility still apply to you.

We recognise that for many colleagues, for example in parts of IT or HR, their immediate customers may be other colleagues and so, where relevant, ‘customer’ can mean colleagues or customers. We also recognise, however, that for every colleague, our ultimate customers are the people and businesses who depend on us every day for their banking and other financial services, and we must ensure that we always consider them in our day-to-day roles.

My Line Manager has asked me to do something which I don’t feel comfortable with and which I think is not in line with the Codes of Responsibility - do I still have to do as my Line Manager has asked?

No. You should speak to your Line Manager, in the first instance, to explain your concerns that their request would require you to break the Codes of Responsibility and to understand why they have asked you to carry out the task. If after discussing this with your Line Manager you are still uncomfortable, you should speak to another Senior Leader in your area. If you still feel that your concerns are not being addressed and need further guidance, you should call HR Advice and Guidance or the Whistleblowing Line. (For Lloyds Banking Group Colleagues Only: More information can be found on the Interchange by clicking here.)

I have spotted something in the Codes of Responsibility which I think should be changed – who should I contact?

Your feedback is welcomed so please email Responsible.Business@lloydsbanking.com.

I have followed regulatory requirements to resolve an issue with a customer but they are still not happy and have made a complaint to the Financial Ombudsman Service. I am concerned that I may be disciplined for not having fulfilled all of the Code of Personal Responsibility commitments under Putting Customers First but I did not feel I had a choice - will I be disciplined?

Situations will arise when you may feel that you are breaking the Codes of Responsibility because you are following a regulatory procedure which doesn’t appear to be in line with our Group Value of ‘Putting Customers First’. You must always follow regulatory procedures and if you feel this means that you are breaking the Codes of Responsibility, you should talk to your Line Manager for guidance.

I do not deal directly with customers, so do the sections in the Codes of Responsibility which refer to ‘customers’ still apply to me?

Yes. The Codes of Responsibility still apply to you.

We recognise that for many colleagues, for example in parts of IT or HR, their immediate customers may be other colleagues and so, where relevant, ‘customer’ can mean colleagues or customers. We also recognise, however, that for every colleague, our ultimate customers are the people and businesses who depend on us every day for their banking and other financial services, and we must ensure that we always consider them in our day-to-day roles.

I’m concerned that I’ve done something which isn’t in line with the Codes of Responsibility – what should I do?

You should speak to your Line Manager immediately to ensure that you understand any possible negative implications of your actions. If your Line Manager is not available, you should speak to another Senior Leader in your area. If after doing so you still have concerns, you should call HR Advice and Guidance or the Whistleblowing Line. (For Lloyds Banking Group Colleagues Only: More information can be found on the Interchange by clicking here.)

I have an issue which I can’t talk to my Line Manager or a Senior Leader about and so I think I need to call the Whistleblowing Line for help – is there anything that this Line can’t help me with?

Yes. If you are unable to talk to your Line Manager or a Senior Leader in your area, concerns over issues such as bullying, harassment, discrimination, career progression, workloads, pay awards and/or other terms and conditions of employment should be raised through the Group’s HR Advice and Guidance Line. More details of the types of issue for which it is appropriate to make a Whistleblowing report are set out in the ‘Guidance on How to Make a Whistleblowing Report’. Customer complaints should be remedied via the normal Complaints Governance process in the first instance. Reports made to the Whistleblowing Line which relate to issues that do not fall within the scope of the Whistleblowing Policy will not be treated as whistleblowing cases and will be redirected to the appropriate area.

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