CODE OF PERSONAL RESPONSIBILITY
THE WAY WE DO BUSINESS IS BASED ON OUR VALUES

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CODE OF PERSONAL RESPONSIBILITY

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“We can only be the Best Bank for Customers by building a great reputation founded on the highest standards of responsible behaviour.”

António Horta-Osório, Group Chief Executive

FOREWORD FROM CHIEF EXECUTIVE
ANTÓNIO HORTA-OSÓRIO

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.

António

“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
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 they understand them, on an annual basis. Compliance with these Codes of Responsibility helps all colleagues to contribute towards the delivery of our Group Values and the five pillars of responsible business, and ultimately enables us to achieve our vision of being recognised as the best bank for customers.

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 our roles.
2. Operate in line with the Codes of Responsibility in all aspects of our roles.
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 are expected to speak out if we have any suspicion of inappropriate behaviour which violates the standards set out in the Codes of 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 of threatened, ongoing, past or suspected violations of the Codes of Responsibility.

This Code of Personal Responsibility includes a Decision Guide to help us if a situation arises where we are uncertain of the most appropriate course of action. We are encouraged to use the Decision Guide and share it with our teams to help us do the right thing.

We recognise that this Code of Personal Responsibility cannot cover every aspect of the way we should conduct ourselves and so, where relevant, we are expected to use our own personal judgement to make the right decision.

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 have 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.

SUMMARISED HERE ARE THE KEY BEHAVIOURS WHICH ENABLE US TO ENSURE THAT WE ARE ALIGNED TO OUR GROUP VALUES.

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.
CODE OF PERSONAL RESPONSIBILITY
PUTTING CUSTOMERS FIRST

WE THINK ABOUT CUSTOMERS FIRST IN EVERYTHING WE DO, CONSISTENTLY STRIVING TO TAKE ACTIONS TO DRIVE TOWARDS POSITIVE CUSTOMER OUTCOMES.

YOUR COMMITMENT:

1. Think about customers first in everything I do

I seek to design products, services or processes which put customers first and are readily understandable and I will challenge others who do not. I will always give easily understandable and accurate descriptions of these products, services or processes to my customers.

I comply with all current legal and regulatory requirements relevant to my role and strive to set a good example.

I take the time to understand how I can make a positive difference to customers’ lives through the products and services that the Group provides.

2. Understand and anticipate customers’ needs

I serve my customers by listening to them, understanding and anticipating their needs and aspirations, and delivering good customer service.

I treat customers fairly, and serve them with professionalism, respect, honesty and integrity.

I consider the risks and implications of my actions and advice and hold myself accountable for them and for the impact they may have on my customers, today and in the future.

3. Deliver on our promises to customers and each other

I deliver on my promises to my customers and when things go wrong, as they sometimes do, I take responsibility to put them right.

4. Take ownership to get things right for customers

I recognise the responsibility I have to deliver excellent service to my customers and take ownership of any issues to ensure this is achieved.
CODE OF PERSONAL RESPONSIBILITY
KEEPING IT SIMPLE

WE MAKE OURSELVES EASY TO DO BUSINESS WITH, COMMUNICATING CLEARLY AND PROACTIVELY SEEKING OPPORTUNITIES TO DELIVER IMPROVEMENTS FOR A SIMPLER CUSTOMER OR COLLEAGUE EXPERIENCE.

YOUR COMMITMENT:

1. Make ourselves easy to do business with
When designing processes or procedures, I will ensure that I make them as simple as possible to avoid unnecessary bureaucracy, thereby making it easier for my customers and my colleagues.

I ensure that any internal processes or procedures are designed in a way which makes it easy for different teams and divisions within the Group to work together.

Rather than designing a new process or procedure from scratch, where relevant I will seek to follow best practice from other teams across the Group.

2. Communicate clearly and openly
I communicate with customers, colleagues and stakeholders in a way which is easy for them to understand, including avoiding technical jargon and acronyms where possible.

3. Identify opportunities to simplify the things we do
I challenge others if I believe a process or procedure is unnecessarily complicated, and provide suggestions on how to improve it.

4. Work to get things right first time, every time
Where things are not right first time, I will work to swiftly and simply resolve the issues. Where processes make it difficult to get it right first time, I will work to improve processes and procedures.
CODE OF PERSONAL RESPONSIBILITY
MAKING A DIFFERENCE TOGETHER

WE WORK TOGETHER CONSISTENTLY IN A COLLABORATIVE WAY WITH COLLEAGUES AND STAKEHOLDERS TO CONTRIBUTE POSITIVELY TO THE CUSTOMERS AND COMMUNITIES WE SERVE.

YOUR COMMITMENT:

1. Work together to deliver for customers
I listen to and work with my colleagues to ensure that I always put the customer first and I challenge those who do not.
I seek to develop my knowledge and skills to enable me to enhance my contribution to the Group’s performance.

2. Use feedback to improve what we do
I take the time to listen to my customers to help me understand how I can better support them to deliver value to them and Lloyds Banking Group.

3. Treat people fairly and act responsibly at all times
I treat my colleagues as they would wish to be treated, recognising that we are all different. I will not discriminate against any individual or group based on factors which are irrelevant to their ability to do their job.
I lead by example and act as a positive role model.
I treat individuals who raise an issue, report a breach or participate in an investigation with respect and good faith and in such a way that encourages colleagues to raise concerns.
I acknowledge and promote a healthy balance between work and home lives, and respect the commitments that others have outside of the work environment.

4. Contribute positively to the communities I serve
I consider all the risks and implications of my actions and advice and hold myself accountable for them and for the impact they may have on my colleagues and communities.
I act in a professional, ethical and sensitive manner when dealing with confidential information to ensure that confidentiality is maintained.
I always behave in an appropriate manner at work-related events whether within or outside of office hours.
I always ensure that my communications, whether written or verbal, which relate to, or could be associated with the Group, for example through Social Media, are of an appropriate nature and will not bring embarrassment to, or harm the reputation of the Group, my colleagues, customers or suppliers.

I seek to understand the environmental and community impacts associated with my role and take these into account when making decisions which have an impact on the communities in which we live and work.
WE REQUIRE COLLEAGUES TO EVIDENCE THAT THEY UNDERSTAND THE REQUIREMENTS OF THE CODE OF PERSONAL RESPONSIBILITY, ON AN ANNUAL BASIS.

Failure to comply with this Code of Personal Responsibility, the Code of Business 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.

We recognise that in some circumstances, failure to comply with the Codes of Responsibility may be due to capability or a need for additional training or support. Where this is the case, the relevant Performance Management or Performance Improvement Policy will be used to address concerns to ensure that colleagues are treated fairly and are given appropriate management support, coaching and training to improve their performance.

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 the underlying HR policies can be accessed on Interchange by clicking here.
CODE OF PERSONAL RESPONSIBILITY
HELP, ADVICE AND GUIDANCE

If you believe that you have witnessed something which contravenes the standards of personal or business conduct outlined in this Code of Personal Responsibility, the Code of Business 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 Business Responsibility
2. Lloyds Banking Group annual Responsible Business Report
3. For Lloyds Banking Group Colleagues Only:
   a. We 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 underlying HR Policies, including the Personal Integrity Policy, and contact details for HR Advice and Guidance can be accessed on Interchange here.

Contact Us
Although the Codes of Responsibility will be reviewed on an annual basis, any queries or comments can be shared at any time by emailing Responsible Business Mailbox – Responsible.Business@Lloydsbanking.com.
For the occasions in which an issue or situation arises and you are uncertain how to proceed, use the following guide to help you do the right thing, whilst remembering Lloyds Banking Group’s basic expectations of your behaviour and conduct as detailed in the Codes of Responsibility. All questions below should be taken into account - they are in no particular order.

**Am I sure my actions are legal and compliant?**
If not, can I seek guidance to help me make an informed decision?

**Have I understood the risks and possible implications of what I am doing?**

**Would I be happy to tell my colleagues, family and friends about my actions?**

**Am I leading by example?**

**Are my actions consistent with our Group Values of Putting Customers First, Keeping it Simple and Making a Difference Together?**

**Would Lloyds Banking Group be comfortable if my actions were reported externally?**

**Will my colleagues also be able to behave in line with the Codes of Responsibility following my actions?**

**Are my actions in line with the Codes of Responsibility and Group Policy guidelines?**


**NO/NOT SURE**
If you answered ‘No/Not Sure’ to one or more of the questions: Contact your Line Manager or a responsible Senior Leader in your business area for further advice and guidance.

If this is not possible, or has been unsuccessful, contact [HR Advice and Guidance](#) or the Whistleblowing Line.

**YES**
If you answered ‘Yes’ to all of the above questions, this indicates that you are operating in line with the Codes.

You can proceed as appropriate, subject to normal sign-off procedures, commercial and business as usual considerations.
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FAQs

1. How does the Code of Personal Responsibility differ from the Personal Integrity Policy?
The Personal Integrity Policy underpins the Code of Personal Responsibility and is one of the many Group Policies which is referenced within the Code. The Code of Personal Responsibility has been designed to engage colleagues and is suitable for sharing with our external stakeholders. As with all other Group Policies, colleagues may be subject to disciplinary procedures if they do not adhere to the Personal Integrity Policy, and this also applies to non-adherence to the Code of Personal Responsibility.

2. 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 read and understand both Codes of Responsibility as any behaviour which goes against the Codes of Responsibility may result in disciplinary action.

3. 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.

4. 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.

5. 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.

6. 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.

7. 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.

8. 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.
9. 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.)

10. 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 does not 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.

11. 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.

12. My Line Manager has asked me to do something which I do not 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 on Whistleblowing can be found on the Interchange by clicking here.)

13. I’m concerned that I’ve done something which is not 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 on Whistleblowing can be found on the Interchange by clicking here.)

14. I have an issue which I cannot 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 cannot 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.

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

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