

# AIB Code of Conduct

September 2015

At AIB we want to maintain a responsible long term focus on the future and prosperity of our business, which focuses on our customers, our shareholders, our employees, and our society. The Code of Conduct guides us in this ambition.

## What is the Code

Our Code of Conduct is about how we behave – both as an organisation and as individuals.

It calls on each of us, individually and together, to always do the right thing and provides a general framework describing what is expected of us. It is supported by a number of policies and procedures. It's a summary rather than a comprehensive 'rulebook' – we have various policies with the details – and it includes examples of how we should behave in typical situations.

These situations are grouped under three headings:

**Our Business** – We maintain the highest standards of integrity and compliance with all laws, regulations and codes in the jurisdictions where we do business.

**Our Customers** – Our Customers financial security is at the heart of our business. We design and deliver everything that we do to reflect this and do so in a responsible and professional way. We provide customers with the right products and services at the right time, and in the right way.

**Our Employees** – Our success depends on our people. We each do our job to the standard expected of us and we treat each other with respect. We look to work together, creating a culture of collaboration, teamwork and personal excellence.

## How do we bring the Code to life?

We bring the Code to life by living our brand values. Simply put this means:-

- We put our customers first – in all our processes, actions, procedures and policies.
- We are empowering – in how we act, make decisions, and learn from our mistakes and our successes
- We build trust and appreciation – with our customers, our stakeholders, our colleagues
- We keep things simple – in our words, acts and deeds
- We are better together – with our customers, our stakeholders, our colleagues

As we continue the journey back to profitability, let's make sure that we become known as a company that puts the interests of our customers financial needs at the heart of what we do; where we are encouraged to take risks responsibly, where we treat each other with fairness and respect and where we are committed to conducting our business with honesty and integrity.

Bernard Byrne, Chief Executive

Richard Pym, Chairman

*This Code applies to all those working in and for AIB, in all jurisdictions in which we operate*

*Effective from September 2015. Next Review date December 2016*

# Doing the Right Thing in Business



We maintain the highest standards of integrity and compliance with all laws, regulations and codes for the jurisdictions in which we operate. We apply clear corporate governance and risk management principles to inform our decisions and we have appropriate procedures for management of risk; including channels for reporting and escalation of issues or concerns and encouraging open communication of all relevant information.

We believe in open and fair competition. We do not engage in any form of bribery, collusive anti-competitive discussions or agreements. We do not abuse our position in any of our markets to gain unfair or unethical advantage.

We make sure that we don't cause poor and unfair customer outcomes or market instability, through inappropriate actions or inactions.

We only take risks that we fully understand, based on the principles outlined in our risk culture charter.

We don't support businesses where we have reason to believe the customer is acting illegally. We are alert to indications of fraud, money laundering and other financial crime, and report them promptly.

We comply with operating and control procedures, and report any weaknesses identified so they can be fixed. If such procedures are breached, then we must report it to management for action.

We maintain high standards of physical security and information security to protect our customers, our employees and our shareholders.

We always respect and protect the confidentiality of any information we receive in the course of our work. We only ever access, use, or share information or data related to work, colleagues, or customers (including our own personal connections such as family and friends) based on business needs and only when we have the business authority to do so.

We do not discuss AIB, our customers or our colleagues directly with the media or through any social media channel, unless it is agreed as part of our job.



# Doing the Right Thing for Customers



We act honestly and professionally with the best interests of our customers in mind and with due skill, care, and diligence.

We treat our customers and other stakeholders with fairness, respect and understanding at all times.

We develop our customer propositions to meet customer needs in line with agreed policies.

We avoid situations where conflicts of interests may arise or appear to arise between the personal interests of our employees and the interests of our customers or of AIB itself, or between the interests of AIB and the interests of our customers. Where a conflict of interest arises, whether real or potential, we ensure it is disclosed to the relevant parties and we require written confirmation from them that they are aware of the conflict and still wish to proceed.

We provide professional advice to a customer only if appropriately qualified and specifically authorised to do so on behalf of AIB. We ask the questions that elicit the customer's real needs and fully disclose to them all information relevant to the product, including all charges.

We never mislead our customers about any product or service, nor will we ever exert undue pressure or influence on our customers.

We handle customer complaints speedily, efficiently and fairly, according to the agreed procedures.

We address authorised representations (private, public, and political) made on behalf of customers appropriately and professionally. We never disclose customer or confidential information to any party unless properly authorised.

We contain and control access to customer information, both internally and externally, based on appropriate business, legal or regulatory need.



# Doing the Right Thing as Employees

---



We demonstrate a sense of personal and collective responsibility for our actions and are accountable for the decisions we make and the consequences of our actions.

We strive to provide a stimulating workplace with a culture of teamwork, trust, appreciation for doing the right thing and consideration for each other.

We treat each other courteously and with respect, dignity and fairness at all times – as we would like to be treated.

We embrace diversity and oppose all forms of unlawful discrimination. We strive to create an inclusive and safe working environment and seek to prevent any form of harassment or bullying and to report and act on it if it happens.

We act with honesty, integrity and professionalism, and hold each other to high standards of personal behaviour and conduct.

We challenge others where we observe examples of poor or inappropriate behaviour, and we escalate to our line manager if appropriate or necessary.

Here are a few things we should be particularly aware of the need to do:

- Exercise common sense and good judgement when using any AIB information and communication systems, including if using them for personal reasons, and never access insecure or inappropriate websites/materials. Similarly when using Social Media either personally or on behalf of AIB.
- Never carry out the bank role in relation to our own banking transactions, or the transactions of a person with whom we have a relationship.
- Be accountable for any document we sign, or witness on behalf of the bank, ensuring that we have the correct authority to do so.



# Doing the Right Thing as Employees

---



- Always seek prior approval as required for activities such as outside business interests or the holding of public office.
- Conduct our personal financial and tax affairs responsibly so as not to bring ourselves or AIB into disrepute.
- Don't engage in alcohol or drug use that impairs our performance or affects the safety of colleagues and customers or the security of AIB.
- Avoid excessive gambling which may lead to serious financial problems which in turn may undermine our fitness to carry out our role.
- Inform our line manager if we are arrested or charged with a crime or offence that might impact on our role in AIB.

It is also important that we take individual responsibility to keep our knowledge and skills up to date to enable us to properly carry out our professional responsibilities. Those of us in certain roles must meet defined standards of fitness and probity. Fitness means we must be competent, capable and authorised to carry out our role. Probity means behaving honestly and ethically and being financially sound.



This Code of Conduct provides a general framework for expected behaviour and is supported by a number of policies and procedures – see the Intranet for those details. An annual COMeT course on the Code is mandatory for all employees, to ensure that each of us takes the opportunity at least once a year to remind ourselves what standards we should always apply to our behaviour at work, with customers and colleagues, and as a business.

Individual compliance with the Code is reflected in our daily behaviour and interactions with our customers and our colleagues. It is measured and reflected in our performance management process which focuses on what we are expected to do (our accountabilities and our objectives) and how we are expected to do it (our brand values). An annual report is provided to the Board on the awareness levels of the Code, aspects for review, and any breaches which have been identified and action taken.

Compliance with some elements of the Code may also be set down by regulatory codes of behaviour, and this will be reflected in local policies and procedures, which will be described as part of your role

## Speak Up

Every organisation faces the risk that something will go wrong. Whenever such a situation arises, the first people to know will usually be those who work in the organisation. It is important for the success of our business that we hear about things which are wrong, at an early stage, so we can fix them. In certain roles, particularly those relating to more senior control functions, you may also have a regulatory responsibility to disclose any concerns or incidents of wrong doing.

It's also really important that we all feel that we can and should report these issues; that we believe we can do so without adverse consequences, and that our concerns will be listened to and acted upon. In the first instance we should feel confident that we can raise issues with our line managers or with the senior management within our business area.

AIB's Speak Up policy and process also provides for confidential and protected reporting. Through this process you can raise issues or concerns in a confidential manner, either directly within the senior levels of the organisation, or with the support of an independent third party.

## Grievance Process

If, as an employee, you feel you have been personally mistreated or have been subject to behaviours which you believe fall outside of the Code of Conduct, you can raise your concerns either informally with your Line Management/people leader or more formally through the bank's grievance process. Your concerns will be treated seriously and will be investigated & acted on as appropriate.

## Disciplinary Process

We all hope to do our jobs well, and we are empowered to make decisions within the remit of our individual roles. Sometimes, even with the best intention, we will make mistakes and we will use those opportunities to learn and improve. However, anyone who intentionally fails to follow the Code, or who deliberately breaches any of the AIB policies or procedures, which support the Code, will be subject to disciplinary action which may lead to dismissal.

## Customer Complaints

In all our jurisdictions we operate a comprehensive customer complaints process, which is designed to provide our customers with the opportunity to be heard, have the concerns investigated, and make good where needed. It is also designed for us to learn and improve from our mistakes. We will follow the timelines and steps set out in these processes, whether determined by regulatory codes or internal best practices.

**If you have any concerns please email: [Code.of.Conduct@aib.ie](mailto:Code.of.Conduct@aib.ie)**

Key AIB Policies related to the Code of Conduct:

[Regulatory compliance](#)

[Fraud Prevention](#)

[Sanctions](#)

[Anti-Money Laundering](#)

[People, Property & Protection Policy](#)

[Internet Gambling Policy](#)

[Anti-Bullying and Harassment](#)

[Dress Code](#)

[Annual leave](#)

[Conduct of personal financial affairs by staff](#)

[Procurement](#)

[Disciplinary Policy](#)

[Conflicts of Interests](#)

[Information Security](#)

[Privacy and Data Protection](#)

[Organisation of Working Time Act](#)

[Absence management](#)

[Expenses](#)

[Diversity and Inclusion Code](#)

[Social Media](#)

[Grievance Rol](#)

[Grievance UK](#)

[Risk Culture Charter](#)

Correct at time of publication (September 2015 – updated November 2015 )