

AIB Group Plc



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Foreword

I am pleased to once again endorse our Responsible Supplier Code (the "Code").

In AIB, Sustainability sits at the centre of our Group Strategy and we have clear targets and ambitions to support our business, customers, suppliers and many stakeholders in line with our purpose of empowering people to build a sustainable future.

For us, this means always challenging ourselves to deliver meaningful social and economic value to our Customers and our Communities.

We are committed to doing business responsibly and sustainably, and to live by our economic, social, ethical, and environmental values. Practically, this means focusing on meeting the needs of the present without compromising the ability of future generations in meeting their needs.

"We want to do business with suppliers that share our approach and our values, and that operate in the same responsible and sustainable manner."

We want to do business with suppliers that share our approach and our values, and who operate in the same responsible and sustainable manner. We seek to work with like-minded suppliers to achieve these goals. This refreshed Code identifies our expectations of you, all your stakeholders, employees, subcontractors and any other third parties, whilst detailing what you can expect from us in return.

Since launching the Code in 2020, we have been extremely pleased with the response and engagement from our suppliers working with us to adopt it into their business.

We want that engagement to continue and ask you to continue to share this Code, values and aspirations, in order to contribute to our mutual success. We are always keen to hear about how we can work better together, including ideas on areas relating to improvements in processes, responsible business, or sustainability.

Together, we can do more, we can do business responsibly, and lead a transition to a more sustainable economy.

Thank you for your support.





Colin Hunt

Chief Executive Officer, AIB Group July 2024

Purpose and scope

The Responsible Supplier Code (the "Code") sets out the minimum standards we expect, and we encourage all suppliers to go beyond these requirements. The term 'Supplier' as used in this Code refers to suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do, or seek to do business with AIB Group.

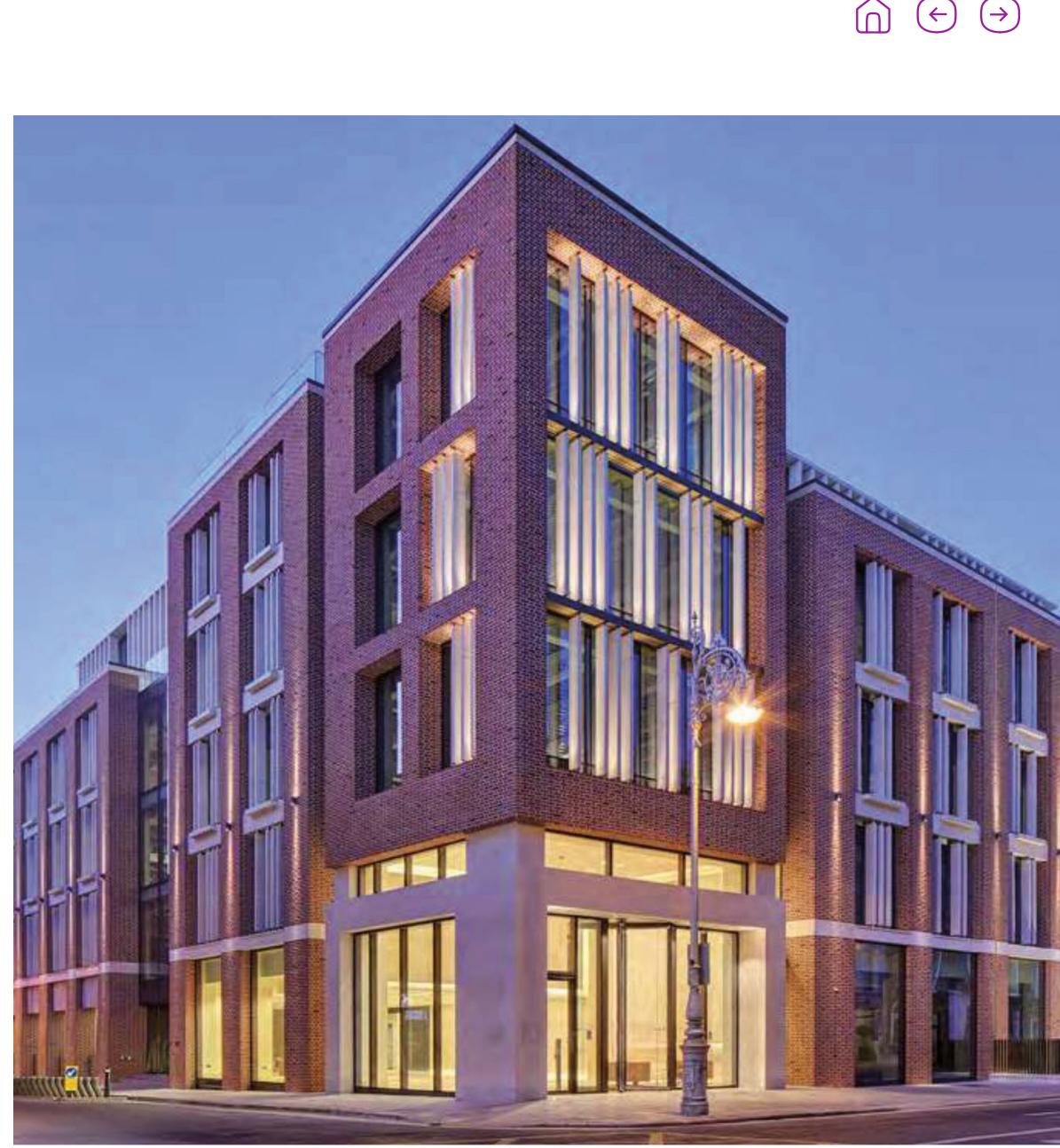
It is expected that suppliers apply similar levels of compliance to their own suppliers or approved subcontractors with whom they work to supply goods and services to AIB. These principles form part of the supplier selection process and are subject to continued monitoring.

Where there is a pre-existing relationship with a supplier, the requirements of this Code are in addition, and not in lieu of, any legal or contractual agreement between that supplier and AIB Group.



Click here to learn more about
 becoming one of our suppliers online.





Our organisation

AIB Group is a financial services provider that operates mainly in the Republic of Ireland but through its subsidiaries also has branches and undertakes activities in the United Kingdom and the USA. We employ 10,500+ staff. With over 3.2 million customers, AIB holds a distinctive role and responsibility in Irish society, with a unique opportunity to make both a meaningful and positive impact in an increasingly challenging and complex world.

We have approximately 4,000 active suppliers on our database, and we transacted with 2.500+ of these in 2023, which we segment across five different tiers that differentiate scale and complexity of business. Each segment attracts a different supplier treatment strategy appropriate to the scale and criticality.

Our supply chains are primarily confined to Ireland and the UK, with a small number of our third parties operating globally. We strictly do not partner with or buy from organisations which we know to breach human rights or fair practices.

Our Responsible Supplier Code is maintained by our Third Party Management (TPM) team, and is reviewed periodically in conjunction with all relevant stakeholders.

The UN Sustainable Development Goals (SDGs) and the Corporate Sustainability Reporting Directive (CSRD) provide a useful ongoing reference to ensure AIB delivers on our regulatory requirements and continues to provide appropriate support as a financial institution and pillar of the domestic economy.

Information as of December 2023. Sources: AIB Detailed Sustainability Report and Company Information.



suppliers we transacted with

employees





Our purpose and values

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Acting in an ethical, trustworthy and compliant manner is at the forefront of how we operate our business. This manifests itself most clearly in how we treat our customers, in our compliance with laws and in preventing fraud and corrupt practices in our business and among our employees.

Our Purpose

Empowering people to build a sustainable future.



O1 Be one team

 \rightarrow Create connections

 \rightarrow Universally include



 \rightarrow Empower others

 \rightarrow Speak up

02 Own the outcome

→ Seek excellence → Take accountability



 \rightarrow Actively simplify

 \rightarrow Be decisive

03 Drive progress

 \rightarrow Embrace innovation

 \rightarrow Deliver sustainability



- \rightarrow Deliver solutions
- \rightarrow Share insight





Our approach to responsible **business** and sustanabity

 (\rightarrow) Policies and procedures

 (\rightarrow) Raising concerns



Our approach to responsible business and sustainability

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Over the last number of years we have been working to build a more sustainable business. We've launched a number of green products to support our personal and business customers, and announced the increase of our Climate Action Fund to €30 billion by the end of 2030. And yet, it's still not enough. And we will keep telling ourselves that every day.





AIB alone is not the solution to climate change, but we are doing everything we can to be a part of it.

We pledge to do more

To meet our objectives and purpose, it is crucial that we act in a responsible, sustainable and inclusive manner, and this includes the way in which we source goods and services from our suppliers. We recognise both the importance of understanding and mitigating environmental and climate risks as well as the moral and commercial imperative for organisations to reduce their environmental impact.

Our Responsible Supplier Code sets out the minimum standards we expect from our suppliers, and the key social, ethical and environmental values to abide by. We want to support an inclusive and ethical supply chain, and ensure that individuals and companies throughout our supply chain work responsibly, sustainably, and safely without impact to the operations or reputation of either AIB or it's suppliers.







This Code is based on AIB's internal Code of Conduct which incorporates these commitments, our values and responsible business approach to support the delivery of our business objectives.

Suppliers are expected to comply with the content of this Code, and must adhere to all legal obligations in each jurisdiction in which they operate or provide services (e.g. environmental and labour law) as well as any specific requirements included in AIB's policies as requested in the contract. Suppliers may be asked to provide a written attestation agreeing that they have read, understand and will abide by the terms of this Code. We will only do business with suppliers that adhere to our Responsible Supplier Code and we require evidence that our top tier Suppliers have a Net Zero Transition Plan in place or are working towards putting one in place.

We require our suppliers to use the Financial Supplier Qualification System (FSQS), an on-line portal to submit information and compliance data about their organisation.

Excluded Activities

Prospective new Suppliers will be excluded from further consideration, if they declare that their activities and / or those of a subcontractor, proposed to deliver all or part of the service, are one or more of the activities included on the AIB Group Excluded Activities List.

Recognition of Sustainable Business Best Practices

ESG specific criteria which align with AIB's Sustainability Strategy are incorporated into the weighted criteria considered as part of all top tier competitive supplier selection processes.

"We want to support an inclusive and ethical supply chain, and ensure that individuals and companies throughout our supply chain work responsibly, sutainably and safely."

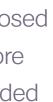


Click here to learn more about our sustainability strategy

View our Code of conduct by clicking here











Learn more about FSQs by clicking here, and viewing the 'How to become one of our suppliers' section.











Policies and procedures

We seek to do our business with integrity, honesty and accountability. Our customers and shareholders expect AIB and all of our employees to conduct business activities in accordance with the highest possible standards of ethical conduct.

Likewise, we conduct our supplier relationships on the highest ethical basis and on the merit of quality, innovation, performance and cost effectiveness. These relationships are important for the continued success of AIB and its subsidiaries and affiliates.





Our Code of conduct

Our Code of Conduct is a core framework that underpins our values and culture. It sets out clear expectations for how we behave and how we do business.

We always act with integrity. We manage our business responsibly, applying clear corporate governance and risk management principles to all we do. We comply with both the spirit and the letter of all laws, regulations and codes where we do business. We are committed to protecting and sustaining the markets in which we operate.

We do not mislead anyone we are in business with by intentionally making false statements or falsifying/ amending any documents or procedures.

We believe in open and fair competition. We do not abuse our position or influence others by virtue of our position in any of our markets to gain unfair or unethical advantage.

We do not engage in any form of bribery, corruption, collusive or anti-competitive discussions or agreements and we don't deal with any organisations that do.

Our anti bribery and corruption components of our financial crime policy

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage, whether received intentionally or unintentionally.

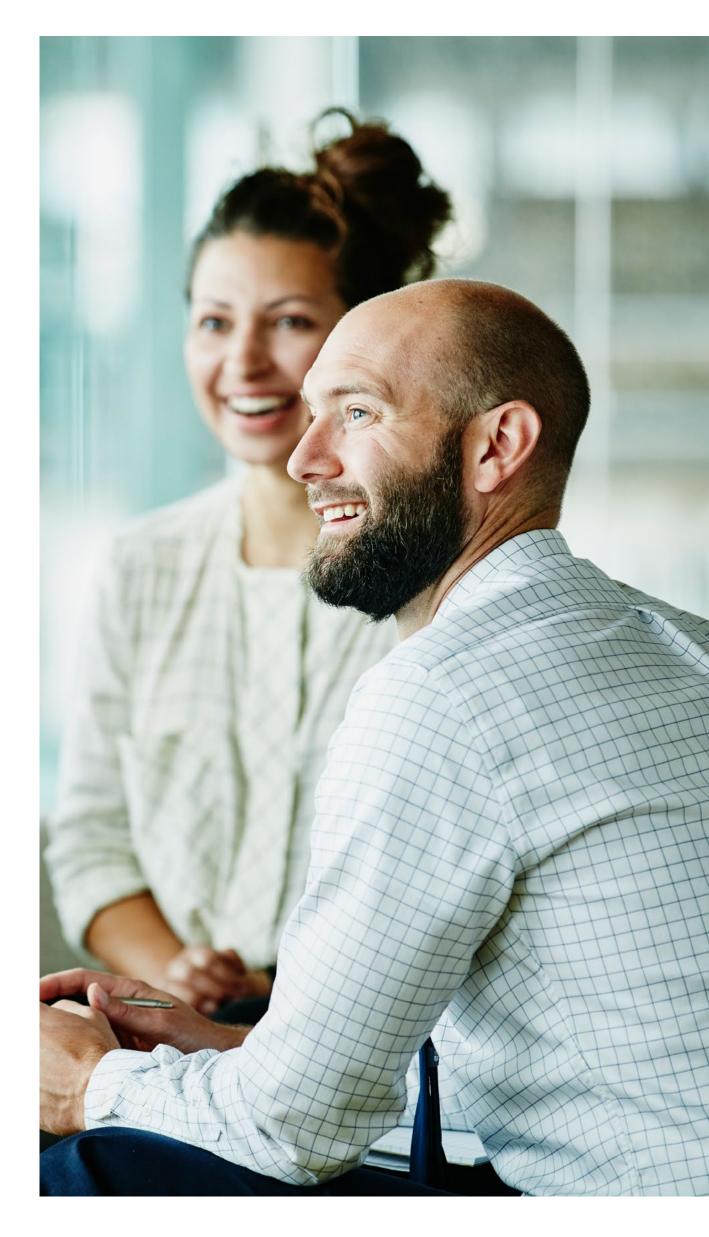
Corruption can be defined as the abuse of entrusted power for private gain of the individual or company. Corrupt business practices put the interests of an individual or company before the interests of the environment, customers, societies, communities and other key stakeholders.

AIB takes a zero tolerance approach to bribery and corruption across all jurisdictions that we operate in. The Bank will investigate any actual or suspected breaches that it becomes aware of. Under law, any gift, benefit or advantage received by a staff member will be presumed to be corrupt, unless proven otherwise.

Our conflicts of interest policy

We take all appropriate steps to prevent or avoid situations where a conflict of interests may arise or may appear to arise. It is not enough to rely on disclosure of actual or potential conflicts: pro-active steps must be taken to prevent conflicts of interests occurring in the first place. Each of us must ensure to take positive action to prevent conflicts of interests arising, and to ensure that our personal interests do not conflict with the wider interests of AIB or its customers.

Click here to read all of our policies and procedures.







Raising concerns

Every organisation faces the risk that something will go wrong, either accidentally or otherwise. All those working in or for AIB (including staff, contractors and third parties) have a responsibility and are encouraged to Speak Up and to raise concerns of wrongdoing or suspected wrongdoing in work. If we have a suspicion about a breach of law or regulation, or a concern about a danger, risk, malpractice or general wrongdoing, including a deliberate breach of our Code of Conduct, it is very important we hear about such things at an early stage, so we can fix them and minimise any damage.

We have a number of mechanisms in place for raising concerns, including our Speak Up (whistleblowing) process.

Our speak up policy

Sets out how all those working for AIB Group, including but not limited to, employees, agency staff, tied agents, suppliers, contractors, consultants, and those providing an outsourced service, can safely and confidentially speak up to raise a concern about suspected or actual wrongdoing in work, without fear of penalisation and ensures that we comply with our obligations under the Public Interest Disclosures Act 1998 (UK), the Protected Disclosures Act 2014 (Ireland) and other similar legislative and regulatory requirements which apply to the Group.



Click here to read more about
 Our Speak Up Policy

Mechanisms for raising concerns:

- \rightarrow Suppliers can contact their appointed AIB supplier manager or business contact to avail of a confidential internal contact number. Alternatively suppliers can **Speak Up** via a confidential email address speakup@aib.ie
- \rightarrow Protect are an independent charity that provides practical confidential advice to anyone concerned about wrongdoing or malpractice at work and are unsure whether or how to raise it. Suppliers that prefer to raise concerns via Protect can access their helpline on +0044 (020) 3117 2520 or find out more here: www.protect-advice.org.uk/advice-line/





Market Restauration We expect

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Human rights and modern slavery

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Supply chain

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Doing business responsibly

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Health, safety and welfare

(\rightarrow)

Inclusion and diversity

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Doing business sustainably







As a Supplier to AIB, we expect you to conduct business in a fair, lawful and honest manner with all your stakeholders, employees, subcontractors and any other third parties, particularly in relation to the following areas:

- \rightarrow Supply chain

What we expect of you

 \rightarrow Human rights and modern slavery

 \rightarrow Health, safety and welfare

 \rightarrow Inclusion and diversity

 \rightarrow Doing business responsibly

 \rightarrow Doing business sustainably

Additionally, we expect you to:

Speak up (\checkmark)

if you are concerned about any actions or decisions that contravene the standards set out in this Code.



Comply with the Code

by supporting the principles outlined in this Code and collaborating with us in our pledge to do more.



Share this Code

with your employees and key subcontractors that support AIB activities or are engaged on our projects.



Let us know

if anything changes and you are unable to comply with the Code.



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Human rights and modern slavery

AIB is committed to the protection and preservation of human rights. We respect human rights in accordance with internationally accepted standards.

Our commitment to human rights is embedded in the culture and values that define our company, and is reflected in our policies and actions toward our customers, employees, suppliers, and the communities and countries where we do business.

We do not tolerate corruption, discrimination, harassment, child labour, forced labour, or slavery in any form.

We recognise our responsibilities relating to our role as an employer, a procurer of goods and service and a provider of retail banking and corporate lending.

We publish a communication as to how we are progressing our approach to human rights annually.

We are committed to an inclusive, safe and ethical workplace as demonstrated within our Code of Conduct.

We expect our suppliers to be committed to acting ethically and with integrity in all their business dealings and relationships, and to implement and enforce effective systems and controls to ensure modern slavery or human rights abuses are not taking place in their businesses and supply chains.

You can read our modern slavery statement here

Find out more about our communication on progress here





Read our sustainability report to find out more







We expect our suppliers to:

- Respect the human rights of your employees and to comply with all relevant legislation, regulations and directives in the countries and communities in which you operate.
- Prohibit forced labour and human trafficking in your supply chain.
- \bigtriangledown
 - Prohibit the use of child labour.
- Provide clear and uniformly applied
 disciplinary and grievance procedures
 including prohibiting mental, physical
 or verbal abuse.

- Respect the rights of employees to join or refrain from joining worker organisations and allow workplace access for such organisations to facilitate their representative functions.
- Ensure employees' working hours and pay rates comply with national laws and industry standards.
- Ensure that employees' total worked hours shall not exceed the maximum allowable under local legislation.
- Ensure all employees' overtime is voluntary and compensated in accordance with applicable laws.



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Health, safety and welfare

The health, safety and wellbeing of employees is of paramount importance to AIB. Safe working is an integral part of our culture, our purpose, our sustainability strategy and is central to our business plans. We are committed to ensuring the safety of our employees, customers, contractors, visitors and our workplaces.

AIB expects its suppliers to commit to providing their employees with serviceable, safe, secure and healthy working conditions, and to comply with all relevant health and safety laws and regulations applicable to their location, and to operate in a manner that is safe.

We expect our suppliers to:

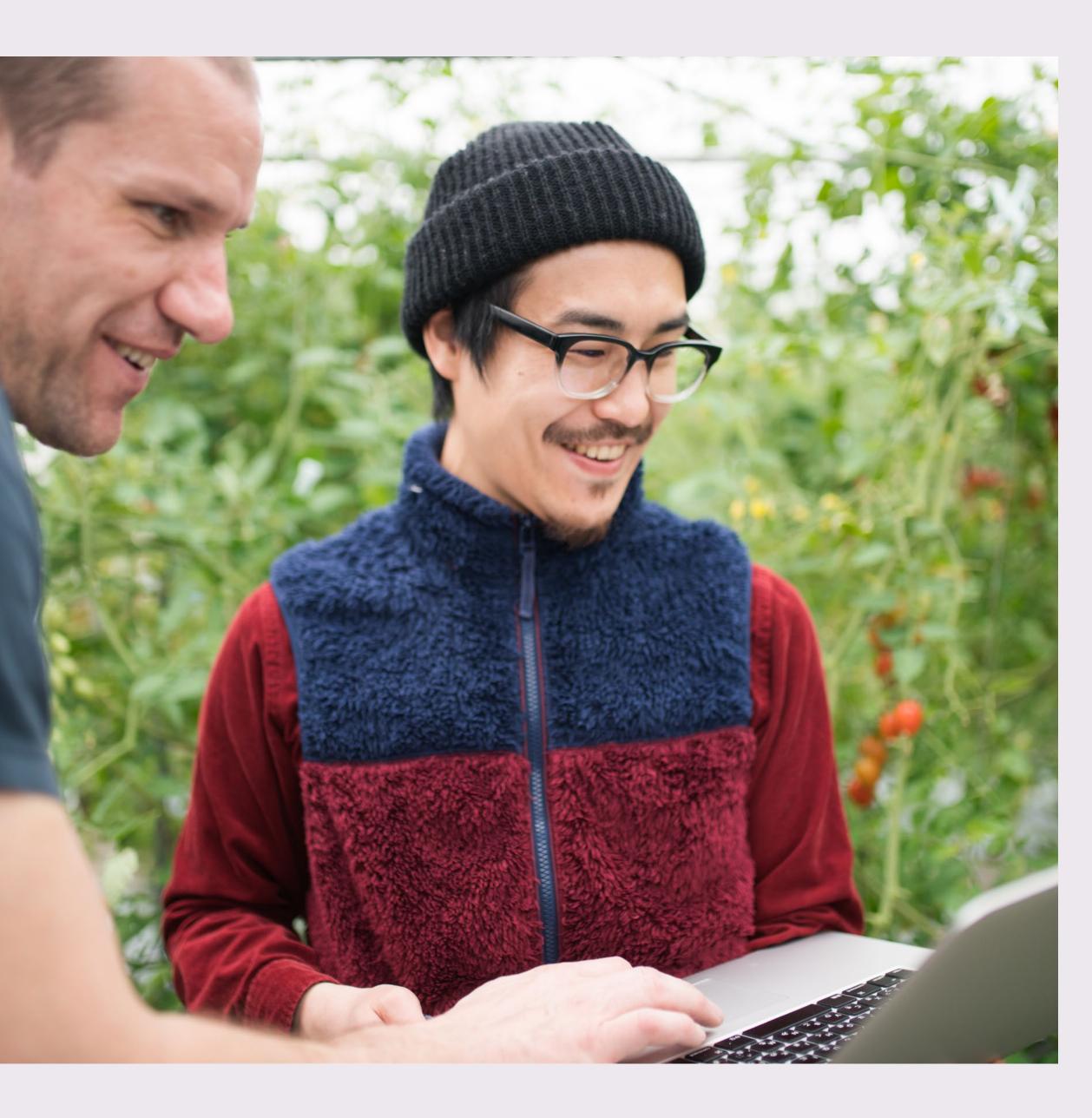
- Provide a safe work environment abiding $\langle \rangle$ by local laws and regulations, respecting the health and wellbeing of your employees, partners, stakeholders, and any subcontractors.
- Have a documented and compliant $\langle \rangle$ Health and Safety Policy.

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Identify and inform us of any incidents that may affect us, and do so in a timely manner.







Managing your supply chain responsibly

A sustainable supply chain is essential to our sustainability strategy. We commit to operating responsibly and sustainably within our supply chains as we continue to do more to build a sustainable future for all.

We expect our suppliers to:

- Treat your suppliers fairly and with respect.
- Manage your suppliers appropriately to $\langle \rangle$ mitigate supply chain risks through fit for purpose governance.

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Ensure adherence to all relevant legislative and efficiency of performance.

Have clear and unbiased payment policies for your own suppliers.

Our suppliers are required to uphold responsible business practices throughout their own supply chain by encouraging the same of their next level suppliers. We expect all our suppliers to manage their own suppliers in a responsible and sustainable manner.

Stay up to date with industry standards and best practices.

Ensure efforts are made towards supply $\langle \checkmark \rangle$ chain optimisation to ensure effectiveness, sustainability, growth, coordination, robustness and responsiveness.

Manage open and transparent methods (\checkmark) of communications with suppliers to encourage operational improvements and efficiency of performance.





Inclusion and diversity

Inclusion and diversity (I&D) are at the heart of our culture at AIB. Embracing difference, embedding diversity and working to ensure universal inclusion helps us to do our best in our thinking, our decisions and our outcomes. It is fundamental to being a successful organisation that our people, and our customers, can believe in.

We embrace, respect, develop and harness the uniqueness of all our employees. Our policies, processes and work practices are designed to create psychological safety, where everyone feels safe to be themselves and express their opinion. AIB also works to advance I&D practices in industry generally, within the communities we serve and in society at large. This is done through our involvement in partnerships, industry fora and relevant not-for-profits.

AIB conducts its business activities in accordance with the highest possible standards of ethical conduct.

We want to do business with suppliers that have similar values to us, and operate in the same responsible manner including with I&D.

We expect our suppliers to:

Treat all employees fairly and to not discriminate in hiring, compensation, access to training, promotion, termination or retirement on the grounds of race (including colour, nationality, ethnic and national origin), religion or belief, age, disability, gender and gender reassignment, sexual orientation, marriage or civil partnership, pregnancy or maternity, family status, membership of the Travelling Community, membership of a trade union or other legally protected status.

Provide reasonable accommodations for staff.





Suppliers are encouraged to:

Put in place controls that support your zerotolerance approach towards discrimination, bullying or harassment.



Have I&D policies, practices and employee offerings in place, including training.

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Collect data to understand the profile of your workforce and have measures in place to improve diversity.

You can read our inclusion and diversity Code here



Doing business responsibly

AIB is committed to conducting all our business activities to the highest standard of professionalism and ethical conduct. We endeavour to support and improve the communities where we operate from an environmental, social and economic perspective.

Our Code of Conduct states our position on many aspects, such as improper payments, conflicts of interest, fraud, competition, gifts and hospitality.

AIB Group expects all suppliers and staff to act honestly, ethically and with integrity in all business transactions and activities. AIB Group does not tolerate bribery or corruption in any form.

We expect our suppliers to:

Maintain accurate records of activities
 and performance that clearly demonstrate
 compliance with all applicable standards,
 regulations and AIB requirements.

Disclose any personal relationships, economic interest or other links to your business held by an employee or contractor with AIB.

6

Refrain from either directly or indirectly promising, offering or providing any improper advantage to any person or entity associated with AIB or our business.



Take reasonable steps to conduct your business in a fair and transparent manner.

Take appropriate measures to secure and protect all confidential information related to your relationship with AIB and use it only for the purpose authorised under contractual agreement.

Have your own policy or statement that covers adherence to local laws, bribery and corruption, and business integrity.

Provide a mechanism for confidential
 reporting of concerns about misconduct
 or unethical behaviour and an appropriate
 means for addressing any issues identified.

Protect whistle-blowers from any negative repercussions.





Doing business sustainably

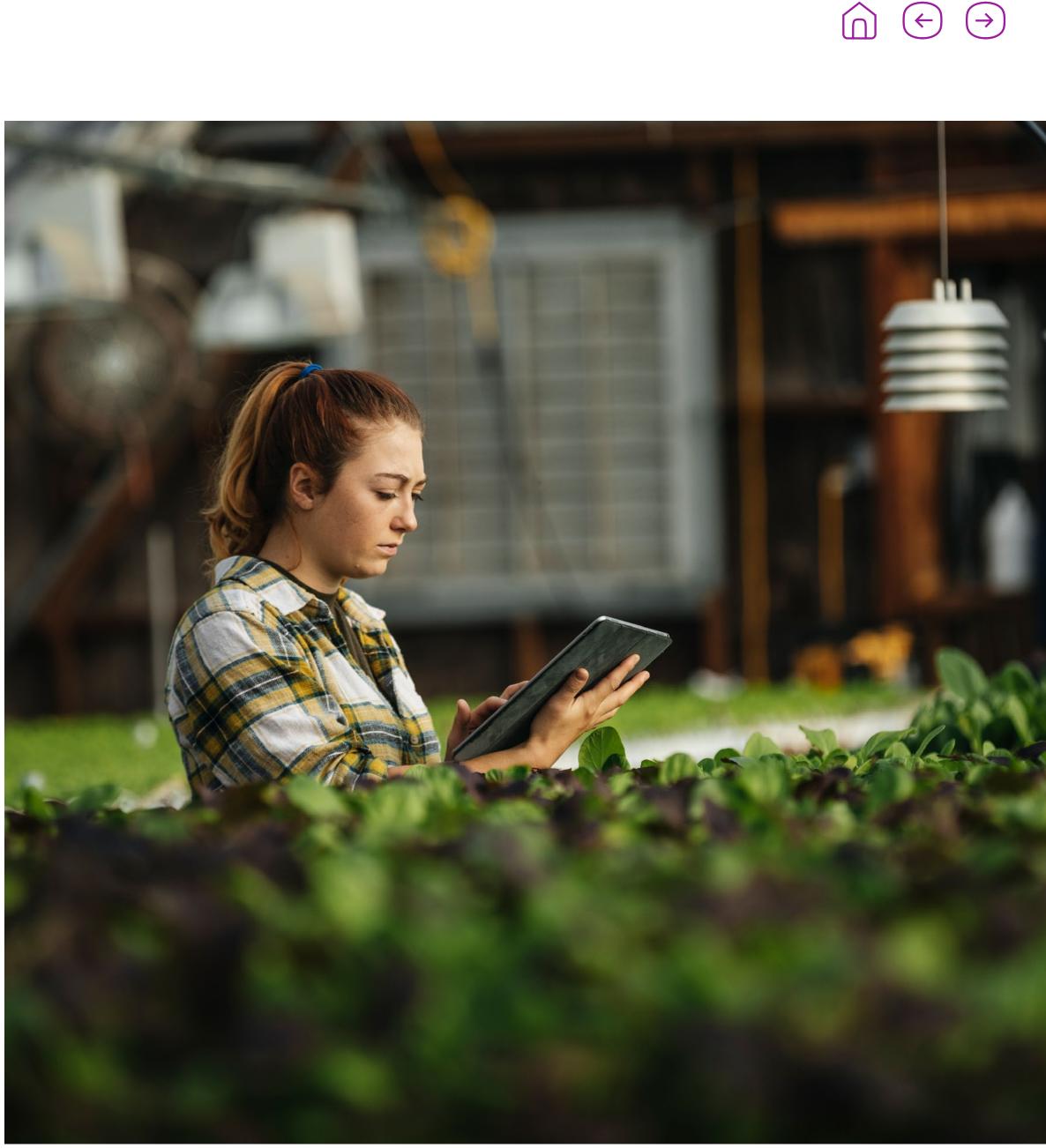
All businesses have a responsibility to be proactively managing and reducing their environmental impact.

We expect our suppliers to:

- Undertake all business activities with care (⁄ for the environment and at a minimum will comply with all applicable environmental laws and regulations.
- Optimise your use of natural resources and minimise the generation of waste.
- Where applicable, seek to secure raw materials from fully traceable, sustainable sources.
- Adopt a written Environmental Policy \bigtriangledown which is appropriate and relevant for your operations.

- Adopt a sustainability strategy which $\langle \rangle$ sets out how your organisation is working to reduce your environmental impacts and support the transition to a low-carbon economy.
- Collaborate with us to help reduce $\langle \checkmark \rangle$ our environmental impacts (which include carbon reduction, energy consumption, travel, water consumption and operational waste).
- Measure your organisation's environmental impact and put in place plans to reduce these impacts.





commitment

$\left(\rightarrow\right)$ Our commitment to you

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Useful links and contact us $\widehat{\square} \quad \overleftarrow{\leftarrow} \quad \overleftarrow{\rightarrow}$

Our commitment to you

O1 Live by our values

by being one team, putting our customers first, owning the outcome, driving progress, showing respect and eliminating complexity.

ensuring our suppliers understand and deliver to the needs of our customers and our business.

04 Providing clear guidance

about our payment procedures.

05 Keep this Code up to date ensuring it is aligned to our approach to responsible business and sustainability.

02 Build strong relationships

03 Collaborate with you

and your teams to share expertise, ensuring the delivery of high quality products and services whilst managing and mitigating associated risks.

06 Sustainable sourcing principles

further embed sustainable business practices within our supplier selection process.



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Useful inks

Contact us

You can access more information on how we work with our suppliers online.

What doing business responsibly means for AIB is available here

We value your feedback.

The Responsible Supplier Code will be reviewed

periodically, however, you can share any queries

or comments at any time with your Supplier Manager

or business contact. Alternatively you can contact us

at suppliers@aib.ie

