



AIB SPEAK UP POLICY – Raising a matter of Concern

Introduction

Becoming a Bank to believe in is an ambitious as well as a challenging aspiration. To achieve this we need to set high standards for ourselves and deliver to those standards. Sometimes, however, we need to recognise that things can go wrong, either deliberately or unintentionally.

Scope - Who does this policy apply to?

This policy applies to all those working in or for AIB Group (including employees, contractors, consultants and those providing an outsourced service).

Policy Statement

Speak up- we will listen

If we believe something may be wrong in work, we each have a direct responsibility to raise a concern about it. Equally the organisation has a responsibility to listen and follow up on such concerns.

It is really important that we all feel that we can safely report these issues without any adverse consequences, and that our concerns will be listened to and acted upon.

The purpose of our Speak Up policy is to provide you with the guidance and support to help us meet this priority and will answer questions you may have about raising concerns including:

1. What concerns can I raise?
2. Who should I raise my concerns with?
3. What will be done with my concern?
4. What do I do if I feel I am being victimised, bullied or treated differently as result of speaking up?
5. Guidance for managers who are dealing with those who have raised a concern

Standards

What concerns can I raise - If you see something within AIB that you reasonably believe may be wrongdoing by anyone working for or on behalf of the Bank, then you must report it.

It might be:

- a suspicion of /or the concealment of a risk, breach, malpractice or wrongdoing such as a failure to comply with a legal obligation or regulation
- a miscarriage of justice
- the commitment of an offence

- improper use of and/or the misappropriation of funds
- gross negligence, mismanagement or malpractice that may harm the reputation or financial wellbeing of the firm
- a health and safety danger to an individual or damage to a workplace/environment
- a risk to the Bank
- bribery, corruption or fraud
- any other general wrongdoing, including a deliberate breach of our Code of Conduct, which may impact on the general public.

This Policy is not intended to address concerns you might have with respect to your own personal circumstances at work. You should raise concerns like this through one of our other processes, such as the Grievance and/or Bullying or Harassment procedures. If we think your concern falls more properly within another procedure, we will tell you.

Protection from victimisation - We guarantee that we will listen, that we will act on any issue identified as a result of your report, and that, once you have reported a genuine concern, you will be protected from any form of reprisal such as any impact on your ongoing employment, harassment, victimisation or penalisation. It doesn't matter if it turns out to be a mistake or if there is an explanation for your concerns. AIB takes a zero tolerance approach to the harassment or victimisation of anyone raising a genuine concern. If you feel you have been victimised, bullied or disadvantaged in any way as a result of raising a concern, please report this immediately to the Head of HR Direct.

Any form of reprisal, breach of confidentiality or detrimental treatment would be in breach of our Code of Conduct and may be subject to disciplinary action and reported to the board.

Remember you may have a professional or regulatory duty to report a concern, if in any doubt then please raise it.

If it is proven that you have deliberately made a false claim for malicious reasons, then you may face disciplinary action.

Confidentiality - This policy provides for confidential and protected reporting of relevant wrongdoing and carries the full support of the AIB Board and ExCo Team. That means that we promise that the person who receives that concern will treat both you and your concern with the utmost discretion and confidentiality and we will keep your identity confidential, if that is what you want, unless required to disclose it by law.

Also this means that you must keep any suspected wrongdoing confidential and only disclose the suspected wrongdoing through the appropriate channels e.g. as specified within this policy. Any breach of confidentiality may be subject to disciplinary action.

Need some advice - You can ask for advice and/or help from either our internal speak up advisors at any time or, if you prefer, you can get external independent advice from "Protect" our independent advisors (see below for contact details).

Extra care – We can provide care services to support those who have raised concerns. These care services will include extended counselling and support from "Workplace Options", check-ins with the person that you raised a concern with and the use of "Protect" as our independent confidential advice line. You can contact these at any time during the Speak Up process.

How does the confidential Speak Up process work?

How to raise a concern - The best place to raise a concern about wrongdoing is locally with the person you report to. However if you feel uncomfortable with speaking up locally, or believe that your report of a concern is not being properly investigated and actioned; or if you would like the organisation to provide you with additional advice, then you can raise your concern using any of the following options (this can be either verbally or in writing);

1. You can raise a concern confidentially with any other People Leader
2. You can contact our confidential Internal Speak Up Phone Line
3. You can contact our confidential Internal Speak Up Email address
4. You can contact any of named Senior Leaders listed within this policy (see below)

The receiver of the concern is obliged to listen, to assess it fully considering the concern in light of this policy (or whether the concern could more appropriately be addressed by any other policy) and /or to escalate it if necessary. They are also required to ensure that you are protected and your concern is treated with the utmost confidentiality during this process and that you do not suffer any detrimental treatment for raising a reasonable concern. We ask that you don't try to investigate any suspected wrongdoing yourself: we have systems in place to do this. If you have reasonable grounds to suspect that something is wrong, then raise it through one of the options above.

You can raise a concern anonymously. However we would advise against this, by doing this, it makes a proper investigation more difficult and sometimes impossible, as we cannot obtain further information from you. Also we cannot provide you with any protection, and we can't give you any feedback following any investigation.

How will we manage a concern-If you raise a concern under Speak Up, it will be acknowledged and we will talk you through how the process will work.

If you have raised an issue with your People Leader and it is straightforward then it should be resolved quickly and you will be updated.

If the matter is more complex and/or you have raised a concern with the Speak Up team directly, then we will assess it and confirm to you (in writing where possible) whether it falls within the scope of this policy and what the next steps are. It could need further investigation and possibly by someone outside of the HR department. You will be updated on progress and how long things are likely to take. Also if it is decided that it should be addressed under another policy or process, for example, under the grievance or bullying and harassment policy, we will advise you on how best to proceed with that.

When the investigation is completed we will let you know the general outcome, although we might not be able to share all the findings with you.

If it turns out that there is no wrongdoing, then we will close the case and there will be no further action. If wrongdoing is proven, then the correct actions will be taken to address it.

We promise you that, as long as you have reasonable grounds for your concern, then we will not allow you to be subjected to any detrimental treatment even if that concern proves to be unfounded upon investigation.

We will keep a confidential record of your concern which will be stored in accordance with data protection legislation requirements.

Escalating a concern- If you are not happy with the way in which your concern has been handled, you can raise it with one of the other people listed below. Alternatively you may contact the chairman of AIB Group, our auditors, or in the UK the Deputy Chairman as our Whistleblowing Champion (appointed under the UK Senior Managers Regime as the independent director with responsibility for the autonomy and effectiveness of this Policy).

In some cases, having raised a concern with your line manager, you might both choose to escalate it through the Speak Up process together, in which case it works in the same way. You can make contact:

- directly to any one of a number of senior leaders in the organisation named at the end of this policy *or*
- through the Speak Up phone line or email.

You will be able to talk about your concerns in confidence or get advice on how the process works.

Raising a concern externally

- You can contact “Protect”, who are an independent charity that provide a confidential advice line for many companies and public organisations in Ireland and the UK. They will give you advice outside of the bank, on how to raise your concern, or even just to ‘sense check’ you’re thinking.
- You may also seek the support and advice of your trade union, if you are a member, on how to deal with your concern.
- In some circumstances it may be appropriate for you to report your concerns directly to an external body such as a regulator. While reporting internally is not a prerequisite to making a report to an external body we hope that in most circumstances you will use this Speak Up policy in the first instance and that you will be comfortable with the outcome. If you wish to report externally, we can advise you on the best way to do this. The Central Bank of Ireland, the Financial Conduct Authority and Prudential Regulation Authority in the UK have a Protected Disclosures process in place covering concerns relating to possible breaches of financial services legislation.
- There are particular requirements for those in more Senior positions:
 - If you perform a Pre-approval Controlled Function (PCF) - within the Fitness and Probity regime (RoI) - then you must also report suspected breaches of financial services legislation to the Central Bank of Ireland. This is a requirement under the **Central Bank (Supervision and Enforcement) Act 2013**.
 - If you are a member of the UK Senior Managers' Regime you also have a requirement to disclose appropriately to the UK Regulators any information of which they would reasonably expect notice. This is a requirement under **Senior Manager Conduct Rules (SC4) of the FCA rules**.

If you are considering reporting your concerns externally we would strongly advise that you seek advice from Protect so that they can support you with this. If you wish you can report a concern both internally and externally at the same time.

All the names and contact details you need are at the end of this policy.

Learning from your concern- By speaking up, you are helping us to identify improvements and giving us a chance to fix things early. We would ask that you report concerns as soon as you have a

reasonable belief that wrongdoing has happened/is happening. This is so that the problem doesn't get worse and potentially cause further damage. We take all concerns reported seriously and the lessons we learn may be shared so that we can all learn from them.

A report on Speak Up is provided to the Board Audit Committee (at least once a year). This includes information on the number of concerns received through the Speak Up process and their general subject (e.g. suspected fraud, breach of customer confidentiality, etc.) along with the outcome of the investigation. High level details are made available for review by the regulator as required.

Some other things you need to know

- Normally issues raised through Speak Up relate to a direct concern about something involving AIB or our staff. If your concerns relate to the actions of a third party such as a customer, supplier or service provider, it might sometimes be better to raise the matter with the third party directly, unless your duties under Anti-Money laundering or other regulations prohibit it (for example, if it could be construed as tipping-off). We would still encourage you to report your concerns internally first so we could give you some advice on how best to do this.
- If your concern involves allegations of certain types of criminal activity or potential criminal activity (for example, theft or fraud) you or AIB may have a legal obligation to report that activity under local law. For instance, if you are based in Republic of Ireland, you have a legal obligation under the Criminal Justice Act 2011 to report criminal or potential criminal activity to An Garda Siochana as soon as possible. If any situation arises, where you suspect criminal activity, we can advise you on the need for reporting and the best way to report.

Guidance for line managers who have received a concern

Handling a concern raised to you is an integral part of your job as a People Leader. Please familiarise yourself with this policy as your response at an early stage is crucial and could be the first step in stopping things from getting worse. – [click here for more information](#)

In Summary

Listen	<p>You can raise a Speak Up in a number of ways:</p> <ul style="list-style-type: none"> • With your line manager • With a more senior manager in your business • Directly with the central Speak Up process by email or phone • Externally with a regulator <p>You can be assured that someone will listen</p>
Respond	<p>The receiver will:</p> <ol style="list-style-type: none"> 1. Take your query and check out the details and establish what has happened. 2. Assess as to whether it falls within the scope of the Speak Up Policy.

	3. Protect you. Once you have raised a genuine concern the receiver will take every step to protect your identity and protect you from any form of intimidation or victimisation.
Act	If your concern is found to be correct, we will put a corrective action plan in place and you will be updated on what has happened

Policy supporting information and the contact details of all internal and external reporting channels are included within the internal policy. Last updated 12.03.2019