



March 2021

SPEAK UP POLICY





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INTRODUCTION

RAISING A MATTER OF CONCERN

Our Code of Conduct is based on our Values that help us deliver on our Purpose. Our Code sets out how we are expected to behave in a manner consistent with our Values and asks us, individually and collectively, to Do the Right Thing. Our Code is our overarching framework that informs our behaviours and decision making and encourages us to Speak Up when we see wrongdoing.

AIB is committed to complying with its legal and regulatory obligations and each of us has a personal responsibility to champion the behaviours outlined in our Code. We also have a responsibility to escalate concerns regarding breaches of our Code or suspected or actual wrongdoing initially through your People Leader or if you are not comfortable, through our Speak Up processes. Speak Up is a core supporting pillar of our Code to ensure that wrongdoing is detected and addressed quickly to protect our customers, staff and business. All reports of wrongdoing will be taken seriously, treated confidentially and investigated with the utmost professionalism.

This Speak Up policy sets out how you can safely and confidentially raise a concern about suspected or actual wrongdoing in work, without fear of penalisation.



In short, please remember:



YOU SHOULD SPEAK UP



WE WILL LISTEN AND ACT



YOU WILL BE PROTECTED

SCOPE

Who does this policy apply to?

This policy applies to all those working in or for AIB Group in any jurisdiction, including employees, agency staff, tied agents, suppliers, contractors, consultants and those providing an outsourced service. This includes staff working in or for AIB's subsidiaries, including EBS d.a.c, AIB Mortgage Bank and AIB UK.



WHAT IS A 'SPEAK UP'?

You should raise a concern under this policy if you have a genuine belief that an actual or suspected wrongdoing may have occurred, is occurring or will occur at work in or for AIB.

'Wrongdoing' for the purposes of this policy includes a breach of law, regulations, codes, our Code of Conduct (and related policies) or unethical behaviour or conduct.

A non-exhaustive list of examples of wrongdoing is below:



Failure to comply with a legal obligation, any financial services rules or laws, regulations, codes e.g. failure to comply with anti-money laundering legislation or the Consumer Protection Code



The commission of a criminal offence e.g. theft or fraud



Failure to comply with our policies e.g. acting unethically, and acting where there is an undisclosed conflict of interest on a relative's account



Failure to meet the fitness and probity standards required for a staff member's role e.g. judgment registered against a staff member



Security breaches e.g. information security breach, inappropriate access to the New Banking System



Health & Safety breaches e.g. hazard in the workplace



Practices that could cause harm to AIB, our staff and / or customers

This policy will protect you if you report a concern when you have a reasonable, genuine belief that there is wrongdoing in work in or for AIB, even if you are mistaken in your belief. However, knowingly making a false or malicious report will result in a referral under our disciplinary procedure.

This policy does not apply to personal grievances, bullying and harassment complaints, complaints

as a customer, or wrongdoing that it is your job to detect. These types of concerns can be raised through the appropriate channels, namely, the Grievance Policy, the Anti-Bullying & Harassment Policy, the Customer Care team and / or to your People Leader. If in doubt as to where to raise your concern, you can contact the Speak Up team for advice.

HOW TO RAISE A CONCERN

You should raise any concern you may have as soon as possible to enable us to take any required corrective action.

It is usually best to raise the concern with your People Leader in the first instance, as they may be able to deal with your concern quickly and easily.

If you do not wish to raise the concern with your People Leader, or if you feel your People Leader has not adequately addressed your concern, you can contact:

- 1**

ANY OTHER PEOPLE LEADER
- 2**

THE INTERNAL SPEAK UP TELEPHONE LINE OR EMAIL ADDRESS
(speakup@aib.ie)
- 3**

THE AIB INTEGRITY LINE
(<https://aib.integrityline.org>)
- 4**

ANY OF THE NOMINATED SENIOR LEADERS LISTED BELOW
- 5**

THE APPROPRIATE EXTERNAL REGULATOR OR BODY
(if appropriate)

All contact through the Speak Up channels will be kept confidential, and your identity will not be disclosed unless strictly necessary for legal or regulatory reasons, or where required for our investigation.

The AIB Integrity Line is a secure web-based system for reporting concerns hosted by an independent third party. It provides the option to raise a concern anonymously (i.e. without disclosing your name or any personal information) while still communicating via the secure inbox with the AIB Speak Up Team.

You can raise a concern anonymously via the other Speak Up channels, however anonymous reports may make a complete investigation more difficult and sometimes impossible as we cannot obtain further information from you. Also, if you report anonymously we cannot give you feedback following any investigation or take active steps to support you.



EXTERNAL REPORTING

We recommend that you raise your concern internally in the first instance, if appropriate, as this will enable us to take steps to address your concern directly and quickly.

However, you can raise concerns about breaches of laws, regulations or codes, or malpractice or maladministration, directly with the appropriate external body, such as to one of our regulators. For example, you may wish to report directly to an external body if you are uncomfortable raising the issue internally or you feel we have not dealt with your concerns. Before reporting externally, you can contact the AIB Speak Up line or Protect, the whistleblowing charity, for advice. You are not

obliged to report the concern directly to AIB first, and you can report a concern both internally and externally if you wish.

The Central Bank of Ireland (CBI), the UK Financial Conduct Authority (FCA) and the UK Prudential Regulation Authority (PRA) have processes in place to deal with reports of possible breaches of financial services legislation, regulations or codes of practice. Concerns can also be reported to the Minister for Finance in Ireland.

In addition, certain senior staff members may be **obliged** to report concerns directly to the appropriate regulator:

ROI

- Under Section 38 of the **Central Bank (Supervision and Enforcement) Act 2013**, if you perform a Pre-Approval Controlled Function (PCF), you are required to disclose to the CBI information relating to a breach of, or offence under, financial services legislation or the concealment or destruction of evidence relating to such an offence or breach, that you believe will be of material assistance to the CBI.

UK

- Under the **Senior Manager Conduct Rules (SC4) of the FCA rules**, if you are a member of the UK Senior Managers Regime you are required to disclose appropriately to the FCA or PRA any information of which they would reasonably expect notice.

HOW WE DEAL WITH YOUR CONCERN

We will address all concerns raised through this policy.

If you have raised a concern with your People Leader and it is straightforward, your concern may be addressed directly by him/her informally. Your People Leader will let you know the general outcome.

If you refer a concern to the other Speak Up Channels, it will be acknowledged as soon as possible, and in any event, within 7 days of receipt. We will review the concern and tell you whether the concern falls within the scope of the Speak Up Policy or another policy or process and what the next steps are.

How we deal with a concern depends on the issues raised. We will review the concern, determine the issues and decide how to proceed, for example, we

may investigate, and/or escalate your concern to the Executive Committee Subgroup on Speak Up or the relevant Business Area. Please note that you should not investigate the matter yourself, as this might impair any investigation by AIB and breach confidentiality.

We aim to keep you informed as much as possible on how we are dealing with the concern.

If we conclude that there has been wrongdoing, corrective action will be taken. If we conclude that no wrongdoing has occurred, the case will be closed.

You will be notified of the general outcome, although we might not be able to share all the findings with you, as the findings and actions could be confidential.

ESCALATING A CONCERN

If you are not happy with how your concern was handled, you can raise it with another People Leader, a Nominated Senior Leader or through the Speak Up email address, telephone number or the AIB Integrity Line.

Alternatively, you may contact the chairman of AIB Group, our auditors, or the relevant Whistleblowers' Champion for Ireland or the UK (contact details are below).

PROTECTION

Whether you raise a concern internally or externally, if you have raised a concern (even if your concern is unfounded or you were mistaken), you will be protected from any form of penalisation for having raised a concern. Penalisation can include threats of or doing any of the following: transfer of duties, suspension, demotion, unfair treatment, unfair performance reviews, exclusion, bullying, harassment or inappropriately disclosing the identity of the person raising the concern.

We take a zero-tolerance approach to the harassment or victimisation of anyone raising a concern. Any form of penalisation against staff raising a concern is a breach of our Code of Conduct and will be referred under the disciplinary policy and will be reported to the Group Board of Directors.

If you feel that you have been penalised for having raised a concern, you should immediately report this to the Head of Speak Up. These reports will be investigated without delay.

CONFIDENTIALITY

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

regulation or it is strictly necessary for the purpose of an investigation.

You must also maintain confidentiality, and not discuss your concern or any element of any investigation / process with any person. Any breach of confidentiality may result in disciplinary action.



SUPPORT

We recognise that raising a concern under the Speak Up Policy can be difficult. We will support you throughout the process. You can contact any of the below for support at any time during the Speak Up process:



The person to whom you raised the Speak Up



Speak Up telephone line or email address. Contact details are available on page 13



The AIB Integrity Line, the independent and secure service for reporting workplace wrongdoing <https://aib.integrityline.org>



Your trade union representative / professional advisor (e.g. a solicitor)



Workplace Options, AIB's Employee Assistance provider



Protect – the UK Whistleblowing Charity. AIB subscribes to Protect, who offer free confidential advice to AIB staff in relation to Speak Ups. Protect do not give any details of what is discussed on the calls or who is calling to AIB unless the caller specifically asks them to do so. Contact details are available on page 13.

GUIDANCE FOR PEOPLE LEADERS 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 and the FAQs for People Leaders, as your response at an early stage is

crucial. You can contact the Head of Speak Up if you have any questions about how to manage or escalate a concern.

OTHER INFORMATION



REPORTING

The AIB Group Board Audit Committee monitors and reviews the effectiveness of the Speak Up Policy and process. An anonymised report on Speak Up is provided to the Board (at least once a year) and includes details of the number and categorisation of reports received, and an analysis of trends and other issues to be aware of.

AIB also prepares an annual report as required under Section 22 of the Protected Disclosures Act 2014, which is made publicly available online.



RECORDS

Records of Speak Ups are kept confidential and maintained in accordance with our obligations under data protection legislation.



LEGISLATION

In addition to our internal policies as a worker in AIB, you have legal protection from penalisation¹ if you raise a concern about certain types of issues, for instance, breach of law, breaches of financial services legislation or regulation, health and safety legislation.

For example, you may be protected under:

ROI: Protected Disclosures Act 2014; the Central Bank (Enforcement) Act 2013

UK: Public Interest Disclosures Act 1998; Employment Rights Act 1996

USA: Sarbanes-Oxley Act of 2002 (as amended), Dodd-Frank Wall Street Reform and Consumer Protection Act 2010, Federal Deposit Insurance Act (as amended)

¹ Definitions of 'relevant wrongdoing' as defined in the Protected Disclosures Act 2014 and 'qualifying disclosure' as defined in the Public Interest Disclosures Act 1998 (as amended) are contained at Appendix 1

OWNERSHIP & GOVERNANCE

Policy Implementation date: 01.09.2016

Last Review Date: 01.11.2020

Last Updated With Changes: 01.11.2020

**Policy is Reviewed/
Next Review Date:** Annually or if changes required by legislation or the business in the interim.

Policy Owned by: Head of Speak Up

ExCo Policy Sponsor: Chief People Officer

**Approval Authority for
Material Changes:** HRSMT



ADDITIONAL INFORMATION

[People Leader FAQs](#)

[Staff FAQs](#)



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APPENDIX

SECTION 5 (3) OF THE PROTECTED DISCLOSURES ACT 2014

(3) The following matters are relevant wrongdoings for the purposes of this Act

- (a)** that an offence has been, is being or is likely to be committed,
- (b)** that a person has failed, is failing or is likely to fail to comply with any legal obligation, other than one arising under the worker's contract of employment or other contract whereby the worker undertakes to do or perform personally any work or services,
- (c)** that a miscarriage of justice has occurred, is occurring or is likely to occur,
- (d)** that the health or safety of any individual has been, is being or is likely to be endangered,
- (e)** that the environment has been, is being or is likely to be damaged,
- (f)** that an unlawful or otherwise improper use of funds or resources of a public body, or of other public money, has occurred, is occurring or is likely to occur,
- (g)** that an act or omission by or on behalf of a public body is oppressive, discriminatory or grossly negligent or constitutes gross mismanagement, or
- (h)** that information tending to show any matter falling within any of the preceding paragraphs has been, is being or is likely to be concealed or destroyed.

SECTION 43B OF THE PUBLIC INTEREST DISCLOSURES ACT 1998

“qualifying disclosure” means any disclosure of information which, in the reasonable belief of the worker making the disclosure, tends to show one or more of the following

- (a)** that a criminal offence has been committed, is being committed or is likely to be committed,
- (b)** that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject,
- (c)** that a miscarriage of justice has occurred, is occurring or is likely to occur,
- (d)** that the health or safety of any individual has been, is being or is likely to be endangered,
- (e)** that the environment has been, is being or is likely to be damaged, or
- (f)** that information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

Allied Irish Banks, p.l.c. is an authorised agent and servicer of AIB Mortgage Bank in relation to origination and servicing of mortgage loans. AIB Mortgage Bank – Registered office: 10 Molesworth Street, Dublin 2 and is registered in Ireland No 404926.

AIB Mortgage Bank is a wholly owned subsidiary of Allied Irish Banks, p.l.c. AIB Mortgage Bank is regulated by the Central Bank of Ireland.

Allied Irish Banks, p.l.c. Registered office: 10 Molesworth Street, Dublin 2. Registered in Ireland No 24173. Allied Irish Banks, p.l.c. is regulated by the Central Bank of Ireland.

Directors' names and particulars are available at the company's registered offices and on the AIB Group website.