

A man and a woman in business attire are looking at a laptop in an office setting. The woman is on the left, smiling and holding a pen over a notebook. The man is on the right, looking at the laptop screen. The background is a blurred office environment with a chalkboard and a plant. A large, stylized graphic element in the shape of a bracket or a large 'C' is on the right side of the image, colored in a bright cyan color. The text 'Group Code of Conduct' is overlaid on the image in a white, sans-serif font.

Group Code of Conduct



Bank of
Ireland

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Message from Francesca McDonagh, Group Chief Executive

Dear Colleagues,

In the past two years, the collective effort of all colleagues has been guided by our Group purpose – enabling our customers, colleagues and communities to thrive. You will know we have worked hard in communicating our Group values - customer focused; one group one team; accountable and agile. We have also published our Competency Model which outlines the behaviours necessary to deliver our strategic ambition.

In order to continue this progress and help to transform our culture, I believe we need to do far more to demonstrate 'how', through our day to day behaviours, we put our values into action.

This change in demonstrable behaviour needs to happen at every level of the organisation, and applies to every single one of us. Our Code of Conduct (the Code) is a helpful tool to enable this and outlines the standards that we set ourselves. We have reorganised the Code to more clearly reflect our values and core competencies, and the relevant standards and behaviours I'm keen for us all to role model.

We need to follow the Code when we deal with others, both within and outside the Bank of Ireland Group, and in our personal financial dealings.

As you will appreciate, the Code cannot be overly prescriptive or specific to every situation. However, its intention is to be a practical and useful guide. It is important we all read and understand the Code. If you are not sure about any part of it, please do speak with your manager.

Importantly, the Code also includes details of what action you should take if you have concerns about behaviours and practices that are in conflict with our culture and values. If you think that someone has not kept to the Code please speak with your line manager, another trusted colleague or follow our Speak Up Policy. The Speak Up policy is covered within the Code and all such cases will be investigated thoroughly.

In addition to formal 'Speak Ups', I want colleagues to feel comfortable in providing informal feedback, regular constructive challenge and ongoing suggestions on how we can improve our culture.. Our efforts to further embed this behaviour are reflected in the OpenView Survey results, which demonstrate continued improvement in colleagues' ability to voice their opinion without fear of negative consequences. We need to continue getting better at this.. Our behaviours must nurture a psychologically safe working environment where we listen, collaborate effectively, and demonstrate the right behaviours to the mutual benefit of our customers, colleagues and communities.

Thank you.

Francesca

Francesca McDonagh
Group Chief Executive



Introduction

Our shared purpose is to enable our customers, colleagues and communities to thrive. To do this; we need to embed our values and competencies. These are the key levers to transforming the culture of the Bank of Ireland Group. Culture is not static and will continue to evolve as we face new challenges or develop new strategic priorities. As such, it is really important to consider the values, competencies and behavioural standards of this code in our everyday conduct. Actions we take, and choices we make, each day can have a far-reaching impact. Remember, you will be measured not just on “what you achieve” but “how you achieve it”.

The Code of Conduct is a document which provides practical guidance for the behavioural and performance expectations for all colleagues. It has been aligned to the Group Competency Model and our values to provide clarity on the principles that are required when we are performing our day to day roles in pursuit of our ambition and purpose. Each component is interlinked and cannot succeed in isolation. By putting the Code of Conduct into action and meeting the standards set out in this document, we create an efficient, customer focused workplace, with a mature culture that fosters growth for our customers, colleagues and communities.

The expectation of the Code is about doing the right thing and behaving in the right way. It is what we should expect of ourselves both individually and collectively as a Group. We are all responsible for following the letter and spirit of the Code.

Who does the Code apply to?

The Code applies to us all at Bank of Ireland Group (the Group), the Group’s subsidiaries and in all Group jurisdictions. This is the case whether we are full-time, part-time, permanent or temporary. The Code also applies to all directors of the Group and all directors of any of our subsidiaries. Some parts of the Code will continue to apply, even if we leave the Group.

Group Competency Model

The Code applies to us all at Bank of Ireland Group (the Group), the Group’s subsidiaries and in all Group jurisdictions. This is the case whether we are full-time, part-time, permanent or temporary. The Code also applies to all directors of the Group and all directors of any of our subsidiaries. Some parts of the Code will continue to apply, even if we leave the Group.

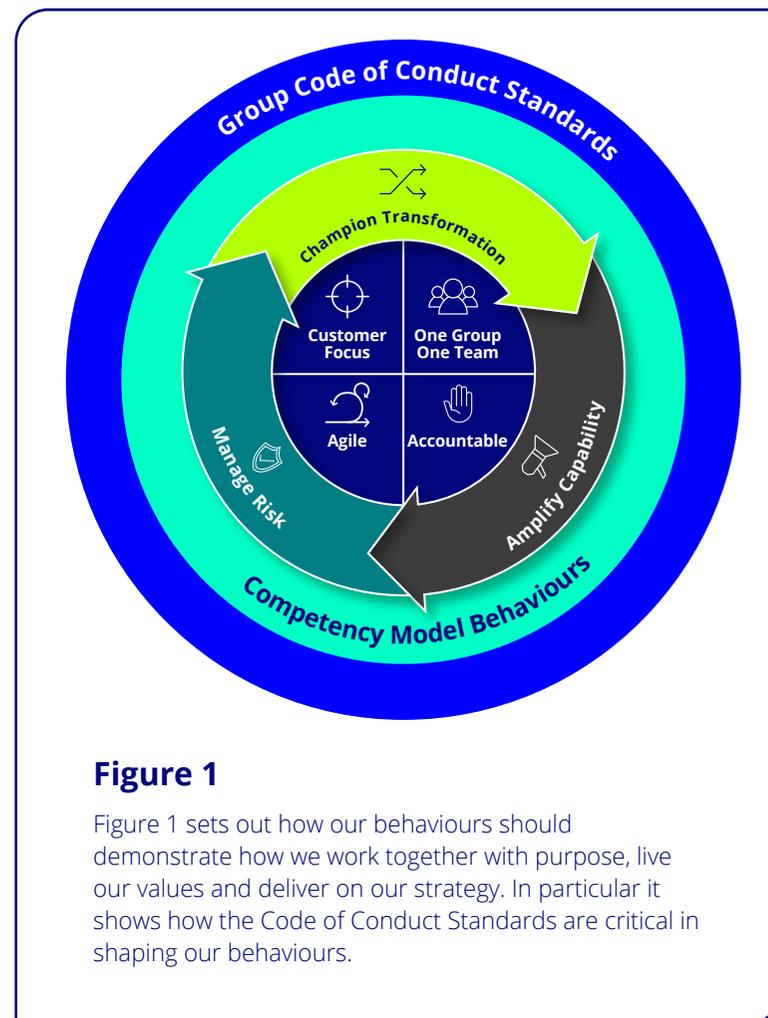


Figure 1

Figure 1 sets out how our behaviours should demonstrate how we work together with purpose, live our values and deliver on our strategy. In particular it shows how the Code of Conduct Standards are critical in shaping our behaviours.



Our responsibilities

We are all responsible for our own behaviour at work, whether face to face, online or via social media. We are all empowered to challenge behaviours that don't align with the Group purpose and values. The Code sets out the behavioural standards which underpin our Group values. One of the Groups, strategic priorities is to Serve Our Customers Brilliantly; we do this by understanding their needs and providing the right products and services:

- To the right customers;
- For the right reasons;
- At the right time;
- By the right people; and;
- In the right way/using the right process.

While doing the right thing for our customers will help us demonstrate compliance with the behaviours and standards set out in the Code and in particular under the Customer Focused Value, we expect everyone to know and understand the Code and act within the principles and spirit of the Code at all times. The Code is not just about knowing what is the right thing to do; it is also about doing it.

If in doubt – ask questions

The Code requires us to do the right thing by our colleagues, customers and communities. In practice this means acting with integrity, However the 'right thing' may not always be clear and there may be differing interpretations or views on how to best

proceed. If you are not sure what to do in any situation, or you need more support you should discuss the issue with your line manager or contact:

- The Conduct Risk Advice Centre (CRAC),
- Contact your Local Assurance/Controls team
- UK, NIAC or US compliance teams
- Group Legal Services (GLS)
- The Vulnerable Customer Unit

Complete and understand the training

All colleagues are obliged to fully understand the Code and complete the mandatory Web Based Training each year. Know the Code – Follow the Code.

What happens if the Code is not followed?

If you don't follow the Code, or if you fail to report something that has not met the principles or spirit of the Code, this can have negative consequences for the Group. You may also face the following serious personal consequences:

- Internal disciplinary action - up to and including dismissal;
- External fines or sanctions;
- Exclusion from taking certain roles, for example directorships; or
- In serious cases, such as theft, a prison sentence may apply.



How to find out more:

- In each section, there are a number of relevant Policies, Policy Standards and associated Guidance documents referenced. You will find these on Insite in the following places; People Policies, Group Risk Policies, Health and Safety and the Inclusion and Diversity Hub. Alternatively you can use the 'search' functionality on Insite.
- Read the Group Speak Up Policy.
- For confidential queries contact the Speak Up Desk speakup@boi.com.
- For general queries about the Code contact the Conduct Risk Advice Centre:
ConductRiskAdviceCentre@boi.com.



Customer Focused

We understand our customers well. We listen to them to ensure they feel valued. We use our insights to consider how best to serve their needs. We take appropriate actions to deliver solutions to meet customers' changing requirements.

Competency Model Behaviours

- Listens and follows up with customers to ensure problems are solved in every situation.
- Builds and maintains customer relationships.
- Understands and acts positively to meet customer requirements.
- We search for ways to improve customer service in person, on the phone or online.
- Acts on customer feedback and undertakes personally to always do the right thing by the customer.
- We never exert undue pressure on customers and ensure that we disclose all charges and features clearly.
- We communicate with customers in a clear, open and honest way to ensure that they understand what we mean in all our communications with them. We never access or intentionally disclose customer information without authorisation or a legitimate reason to do so.
- We take responsibility for putting things right if we don't meet a customer's reasonable expectations first time. We handle complaints efficiently ensuring fair outcomes.

Code of Conduct Standards

- We consider the best interests of our customers and always try to deliver fair customer outcomes.
- We care about our customers' financial wellbeing and we consider this alongside their financial needs and objectives.
- We design products that are easy to understand and simple to use, and charge for them in a transparent, fair and reasonable way.
- We listen carefully to what customers say to make sure we create and offer those products and services that best meet their needs.
- We follow Group and local procedures in place for customers who may be vulnerable. We work to ensure that all our customers have equal access to suitable products and services.
- We do not make decisions without considering the impact on our customers.
- We do not exploit any customers. We take particular care when dealing with any customer who may have a vulnerability.
- We do not always say "yes" to our customers where this is not in the customers' best interests.



**Find out more
in the following:**

- Group Competency Model
- Conduct Risk Management Framework
- Group Conduct Risk Policy
- Group Product and Services Governance Policy Standard
- Group Product and Service Lifecycle Policy Standard
- Group Vulnerable Customers Policy Standard
- Group Complaint Handling Policy Standard
- Group Data Protection & Privacy Policy
- Group Consumer Errors Management Policy Standard
- Group Refunds and Remediation Policy Standard
- Bank of Ireland Customer Charter (UK)



One Group, one team

We know we work smarter when we come together behind our common purpose. We learn from each other and share ideas to expand our thinking. We build an open, trusting and collaborative environment and foster diversity of thought, ideas and experiences to spark creativity.

Competency Model Behaviours

- Shares information, ideas and opinions with colleagues.
- Involves others as appropriate to accomplish individual and group goals.
- Encourages unity rather than “us vs. them” thinking.
- Welcomes and values the diverse ideas and input of others.
- Is curious and seeks to understand about the Group.

Code of Conduct Standards

- We endorse and help to create an open and transparent environment in which colleagues feel safe and supported to raise concerns.
- We promote an inclusive work environment which values both our similarities and our differences, where everyone has an opportunity to fully participate in creating success.
- We respect diversity, which includes diversity of opinion, perspective and experience.

- We value our colleagues for their personal skills, experience and perspectives.
- We maintain a healthy and safe working environment that supports the well-being of our colleagues, customers and suppliers enabling them to be at their best.
- We consider feedback from all sources to allow us make decisions in a fair, open and honest way.
- We recognise the interdependency of all teams across the Group for success. We perform to a high standard in order to achieve our purpose and ambitions.
- We share resources and knowledge with our colleagues and drive better outcomes through collaboration.
- We show each other courtesy, we do not disrespect our customers or colleagues through any medium, including social media.
- We do not devalue our colleague’s time by poor timekeeping or non-engagement on reasonable requests.



**Find out more
in the following:**

- Group Competency Model
- Group Harassment & Bullying Policy
- Group Smoke-Free Workplace Policy
- Group Health & Safety Policy
- Group Conduct Risk Management Framework
- Group Conduct Risk Policy
- Group Speak Up Policy
- Group Guidance for Managers Handling Speak Up Concerns
- Group Inclusion & Diversity Hub on Insite
- Group Equal Opportunities Policy
- Group Paternity Leave Policy ROI and UK
- Group Maternity Leave Policy ROI and UK
- Group Adoptive Leave Policy ROI and UK
- Group Carer’s Leave Policy ROI and UK
- Group Flexible Working Policy
- Group Emergency Annual Leave Policy
- Group Career Break Policy
- Group Gender Identity and Transitioning in the Workplace Policy
- US Employee Handbook
- Disciplinary Policy
- Grievance Policy
- Employee Assistance Programme



Agile

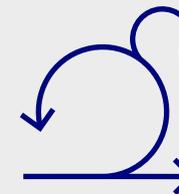
We embrace change with an open mind and a can-do attitude. We respond quickly and productively seek different perspectives. We challenge ourselves to look for new and simplified ways to efficiently deliver the best solutions for our customers.

Competency Model Behaviours

- Learns from mistakes and adjusts accordingly.
- Demonstrates initiative and maintains motivation to acquire new knowledge, skills and ways of working.
- Learns and seeks to apply innovative methods, tools and technology that ultimately benefit the customer, colleagues and communities.
- Demonstrates a solution oriented attitude and willingness to try new things.
- Uses good judgement about whether to act independently collaborate with others or escalate an issue.

Code of Conduct Standards

- We work quickly and efficiently to progress our agenda, thereby delivering real solutions for our customers colleagues and communities to thrive.
- We engage early with relevant subject matter experts to ensure there is no negative impact on our respective work.
- We do not exclude ourselves from participation in new ways of working or new work practices.
- We do not let our setbacks discourage us from seeking opportunities in the future.
- We embrace continuous learning, by seeking to expand our knowledge and skillset.



**Find out more
in the following:**

- Group Competency Model
- Group Performance Achievement Policy
- Flexible Working Policy



Accountable

We are empowered to take ownership and trusted to do the right thing to support our customers, colleagues and communities. We lead by example and challenge ourselves and each other to do our best work at all times. We learn from our mistakes and celebrate our successes together.

Competency Model Behaviours

- Takes responsibility for own actions and deliverables.
- Holds self-accountable to follow through on commitments.
- Sets high standards for own performance, proactively manages own performance achievement process and Individual Development Plan (IDP).
- Shows determination to deliver in the face of obstacles and setbacks.
- Seeks input to ensure clarity of expectations placed on oneself.

Code of Conduct Standards

- We are prudent in all our personal financial affairs and seek help if we find ourselves in financial difficulty at any time.
- We make our line manager aware of any personal financial concerns, where there may be an impact on our role.
- We make sure that our private or personal interests (for example, directorships of other companies and relationships with customers) do not interfere with the interests of the Group or our customers. We declare all potential conflicts of interest to line management for approval.
- We speak up for what is right even where we feel this is a difficult thing to do.
- We do not compromise market integrity by acting on or disclosing inside information.
- We recognise and understand that bribery and corruption is unacceptable and we act honestly at all times when dealing with customers and business partners.
- We do not give special treatment to people connected to us, such as family, friends, directors, senior managers or significant shareholders. For example, not charging fees, lending on better terms, processing or acting upon, any account instructions for such persons without following the correct protocol.
- We do not use social media in a way that affects the reputation of the Group or reveals confidential information.
- We do not dilute our accountability by blaming colleagues when things go wrong, but work together on solutions.
- We actively use the 'Code of Conduct Check' to ensure our decisions and actions align with the Group's Purpose and Values and seek advice when we are unsure.



Find out more in the following:

- Group Competency Model
- Group Conduct Risk Management Framework
- Group Conduct Risk Policy
- Group Market Conduct Policy Standard
- Group Conflicts of Interest Policy
- Group Personal Conflicts Policy Standard
- Group Personal Conflicts of Interest Guidance
- Group Conflicts of Business Interest Policy Standard
- Group Conflicts of Business Interest Policy Standard Guidance
- Guidelines for Managers for Handling Potential Conflicts of Interest
- Group Policy Standard on Anti - Bribery and Corruption
- Group Social Media Guidelines
- Bank of Ireland Group Share Dealing Policy Manual
- Group Competency & Capability Policy Standard
- Your local Business Unit guidance on gifts, invitations, sponsorship and other benefits
- Minimum Competency Regulations
- Fitness and Probity Standards FAQ
- Code of Practice on Lending to Related Parties
- US Compliance Manual (for US based Colleagues)
- Group Operational Risk Policy



Champion transformation

Creates energy and optimism for the future of the Bank and shows personal commitment to the vision. Paints a compelling picture of the vision and strategy that motivates others to action. Personally embraces and champions transformational change by talking about future possibilities and tirelessly looks for ways to transform the Bank, achieve efficiencies and better outcomes for customers.

Competency Model Behaviours

- Understands and demonstrates how own work fits into the achievement of our Ambition, Purpose and Values.
- Seeks ways to improve processes.
- Embraces change, adapting quickly and dynamically to new ways of working.
- Remains resilient and continues to deliver during times of change and ambiguity.
- Looks for opportunities to achieve efficiencies that will create sustainable value for the organisation and the customer.

Code of Conduct Standards

- We actively contribute to the achievement of both team and Group transformation.
- We actively use the 'Code of Conduct Check' to ensure alignment with our purpose and values on all new and revised Terms Of Reference, Policies, Policy Standards, procedures (including telephony scripts and sales procedures), training and guidance notes.
- We participate in 'continuous improvement' by raising any suggestions for fairer, more efficient or prudent procedures or work practices.



**Find out more
in the following:**

- Group Competency Model
- Thrive Hub
- Group Performance Achievement Policy
- Flexible Working Policy



Amplify capability

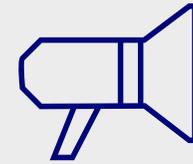
Dedicated to personal, organisational and individual development of skills, knowledge and abilities, regardless of career level. Develops self and others to meet both career goals and the organisation's goals. Builds capability both for now and for the future.

Competency Model Behaviours

- Shows personal commitment and takes action to continuously learn and improve.
- Regularly asks for and acts on feedback.
- Seeks additional job responsibilities to broaden skills and develop own career.
- Self-motivated and directed to acquire and apply new knowledge and skills.

Code of Conduct Standards

- We achieve and maintain the level of competency and capability required for our role.
- We are responsible for our individual performance.
- We make sure we are adequately trained to fulfil our role.
- We complete all mandatory training within the required timeframe.
- We only provide professional advice to customers when we have the appropriate knowledge of products and services and have the required qualifications to do so.
- We support team members and new colleagues to be at their best.



Find out more in the following:

- Group Competency Model
- Group Competency & Capability Policy Standard
- Minimum Competency Regulations
- Fitness and Probity Standards FAQ
- Thrive Hub
- Group Performance Achievement Policy



Manage risk

Committed to being risk aware. Identifies analyses and manages risk to protect the Bank and its people, while supporting opportunities that drive successful strategic outcomes. Makes timely and well-informed decisions within defined governance structures.

Competency Model Behaviours

- Demonstrates an understanding of the principles and practice of risk management and compliance in role.
- Proactively contributes to the risk assessment process.
- Identifies the underlying issues and root cause of problems and acts appropriately.
- Proactively identifies and escalates key risks in a timely manner.
- Considers various inputs, criteria and trade-off to arrive at effective decisions and recommendations and mitigates risk.

Code of Conduct Standards

- We read and follow the Compliance Policy Statement (see page 14 of this Code).
- We carefully apply the minimum standards set out in all Group Policies.
- We treat all information as confidential. We do not release information about any of the Group's activities, customers or employees to people outside the Group, including the media, without permission.
- We manage our data in line with all relevant Group policies and standards.
- We manage our risks effectively, with an appropriate review cycle to identify, manage and report (via RADAR).

- We follow procedures to prevent financial crime such as fraud, money laundering or funding terrorism.
- We report suspicions of criminal activity in line with our policies and policy standards.
- We comply with competition law where this applies to what we're doing. If we are involved in activities for which competition law is relevant, we complete and understand the mandatory training.
- All communication with regulators and government agencies will reflect the formal and authorised position of the Group and will be undertaken by authorised people.
- The Group strives to ensure that modern slavery or human trafficking does not support our supply chain or our business.
- We refer any concerns about the Group's accounting, financial control or audit processes direct to the Group Secretary (who will give it to the Chairman of the Group Audit Committee) or in line with the Speak-Up policy.
- We do not falsify or conceal records, interfere in auditing processes or illegally alter or destroy documents.
- We do not lobby on the Group's behalf, unless we are authorised to do so by a member of the Group Executive Committee.



Find out more in the following:

- Group Competency Model
- Group Anti Money Laundering (AML)
- Group Competition Law Compliance Manual
- Group Policy Standard Communicating with Regulators
- Group Sanctions and Countering the Financing Terrorism Policy
- Group Data Protection and Privacy Policy Standard
- Group Information Security Policy Standards
- Conduct Risk Management Framework
- Group Conduct Risk Policy
- Group Speak Up Policy
- Group Conduct of Business Policy Standards
- Group Market Conduct Policy Standard
- Group Health and Safety Policy
- Group Policy Standard Fraud Risk Management
- Regulation of Lobbying ROI
- Code of Conduct Check – Quick Guide



Speaking up

'Speaking Up for what is right'

The Group is committed to fostering an open and transparent working environment where we can all feel supported and safe to raise any issues or concerns. We can all contribute positively to building a risk culture which embraces constructive challenge and creates a working environment where employees and management show and receive support for raising any concerns. If you have a concern regarding a colleague not following the Code, or any of the other Group Policies or Policy Standards, you should speak to your line manager, the Speak Up Desk at speakup@boi.com or contact any of the prescribed people listed on Appendix 2.

When something at work worries you

We sometimes have concerns about something that may not be right at work. Worries like this can usually be sorted out simply and quickly by speaking with your line manager. However, when it comes to potential or actual wrongdoing such as unfair treatment of customers, aggressive or underhand behaviours in the workplace, illegal activities, bribery, financial malpractice, dangers to the public or the

environment, or possible fraud or risks to the Group, we may not feel like we can speak with our line manager.

It is safe and acceptable to Speak Up

It is always safe and acceptable for you to raise a concern about any possible wrongdoing. In fact, without your help, there's a risk that the Group will not know about potentially serious problems until it is too late. Speaking Up can help the Group focus on specific concerns. It is important that you raise any concern you may have through the Speak Up channels, this will drive an open and transparent working environment where colleagues can feel supported and safe to raise concerns.

You won't suffer by raising a genuine concern

We will not tolerate any negative impact on anyone who has raised a genuine concern. If you raise a genuine concern, you will not be at risk of losing your job or suffering any form of retaliation as a result. If you want to raise a concern, follow the guidance in the Speak Up policy.



Find out more in the following:

- Group Speak Up Policy
- See Appendix 2: Speak Up Infographic.

(This can be printed off and used as a visual aid in your working area and as a tool to aid discussion in your team meetings).



Getting help

'Helping Colleagues to thrive'

Wellbeing is about thriving as an individual, about being happy and healthy. Supporting wellbeing is central to enabling our purpose - it's a practical way to put our values into action, and above all is the right thing to do. Bank of Ireland wants colleagues to feel supported and that their health wellbeing is a priority.

Our wellbeing journey spans our entire life and doesn't start or stop when we are at work. Our wellbeing offering has an emphasis on Mental and Financial Wellbeing, with a key support role for Physical Wellbeing.

In addition to the support colleagues have from their People Manager Bank of Ireland we have a Bank of Ireland App/ Web Portal, specifically for Bank of Ireland colleagues to help support colleague wellbeing, whenever and where ever we need it.

Another key support provided to colleagues from a wellbeing perspective is our Employee Assistance Programme (EAP).

Our EAP provides Bank of Ireland colleagues and their families' free access to confidential support via telephone, web, live chat, or on the Laya EAP app anytime, anywhere. Case managers are the experts from a large variety of fields who provide immediate support and possible referrals to short-term personal and work-related issues.

The EAP offers solution-focused services such as: legal assistance, financial assistance, consumer advice, career guidance, life coaching, mediation, support for international employees, counselling, referral services, health advice and advice on practical, day to day issues.

For more details on the Bank of Ireland colleague App/Web portal and portal please go to the Wellbeing hub on Insite.



Find out more in the following:

- EAP Policy – ROI & UK
- Life Assistance Programme USA



Compliance Policy Statement

This Compliance Policy Statement is a critical element of the Code of Conduct and supports the Group in meeting regulatory requirements and expectations. All employees are required to meet the requirements of this Policy Statement on an ongoing basis.

The Group provides a wide range of financial services to customers across varying markets and jurisdictions. In doing business we must be accountable and act with integrity in all our dealings. Specifically, we must:

- keep to and abide by all relevant legal, regulatory and other requirements; and
- act honestly, fairly and reasonably in our dealings with customers, colleagues and communities.

Bribery and corruption are unacceptable, and everyone involved in or dealing with the Group is expected to act honestly at all times. We will not consider any business activities where bribery or corruption is necessary to make a contract binding.

By keeping to the letter and intention of the law and regulations, we aim to gain the trust of our customers, the respect of our stakeholders and the pride of our colleagues in the organisation.

We will also:

- Protect the reputation of the Group;
- Meet the requirements of all regulators;
- Avoid the cost of 'having to put things right'; and
- Protect our business.

As an employee of the Group, you must do the following:

- be personally responsible for making sure that you keep to both the letter and intention of this policy;
- act, honestly, ethically and with integrity;
- act with due skill, care and diligence;
- pay due regard to the interests of customers and treat them fairly and professionally;
- observe proper standards of Market Conduct; and
- be open and cooperative with our regulators, and deal with them in good faith. e.g. CBI, FCA, PRA, FED.

(Note: there will be additional standards that will apply to specific parties, once the Senior Executive Accountability Regime legislation is enacted.)

If you have any doubts or concerns about a matter relating to a legal or regulatory requirement, you must:

- discuss the matter fully with your line manager or another trusted colleague;
- raise the matter through the Group Conduct Risk Advice Centre; or
- raise the matter independently of management, as set out in the Speak Up policy.

You will not be criticised by management, or be disadvantaged in any way, as a consequence of reporting a failure to keep to our legal or regulatory obligations, as long as you do this through appropriate channels, including those referred to in Appendix 2

If you witness any activity that does not meet our legal or regulatory obligations, and you do not report the matter, you may be accused of being involved in the activity and have to face the consequences. In certain circumstances, failing to report these activities may lead to you being prosecuted.

A good reputation is hard to gain and easy to lose. Every employee has a role to play in protecting our reputation. This is a duty, not an option.



Appendix 1

Code of Conduct Check

Enabling our customers, colleagues and communities to thrive

This is the core purpose of the Bank of Ireland Group. When we make decisions, we need to adhere to the high standards we set for ourselves in our Group Values and the Code of Conduct. For every decision we make, we need to be sure that we are doing the right thing. The 'Code of Conduct Check' poses a series of questions to help us ensure customer focus (especially Vulnerable Customers) and demonstrate group wide teamwork, agility and individual accountability.



Am I serving my customer brilliantly?



Have I collaborated effectively with all my stakeholders?



Is this the smartest solution?



Have I taken personal responsibility to do the right thing?



Am I actively contributing to the success of this change initiative?



Do I have a capability gap in this subject matter?



Have I considered relevant international and external risk and compliance obligations?

We are all empowered to challenge behaviours that don't align with the Group purpose and values



Appendix 2

Speak Out

Speak Up

1 See It
Do you have...
a concern at work?

"I think there may be a conflict of interest"

"I suspect we are mis-selling to elderly or vulnerable customers"

"I suspect this may be fraud"

"I'm worried about how a colleague has been treated"

"I'm worried this gift is too expensive"



2 Speak Out
To a manager...
What do I do?

We all have a role to play in protecting our customers and colleagues and to help them to prosper.

We also have a role to play in safeguarding the Bank's reputation, building great relationships with our communities allowing our customers, colleagues and communities to thrive.

We all have a responsibility to speak out and to hold each other to account to ensure we have an efficient and psychologically safe working environment for us all to thrive.

We value your honesty and feedback. If you know of a better way of working that manages our business and risks, or if you have any concerns that we are not working as best we can, we encourage you to let your manager know.

Remember, it is important to always ask questions when you are unsure of what is expected of you.

3 Speak Up
Who can I...
Talk to internally

Prescribed Person

- ✉ John.Hall@boi.com
- ✉ Eavan.Garvey@boi.com*
- ✉ Megan.Silvia@boi.com

Or

The Speak Up Desk
Group Conduct Risk, 3rd Floor,
40 Mespil Rd., Dublin 4
✉ SpeakUp@boi.com

Line Manager

Senior Manager

 This can be as far up as the Group Chief Executive

- ✓ **Confidentially:**
Confirm you require your concern to be kept confidential or otherwise
- ✓ **Anonymously:**
By sending a written note to any of the above

*Senior Prescribed Person for NIAC, Madrid, Frankfurt, Paris

If you are a Manager and a concern is reported to you, you must talk to the Speak Up Desk or a Prescribed Person.

4 Speak Up
You can also...
Talk to externally

Protect

- ☎ ROI: 1800 246 137
- ☎ UK: 0800 008 6430
- ☎ Other: +44 207 404 6609
- ✉ whistle@protectadvice.org.uk

Central Bank of Ireland (CBI)

- ☎ 1890 130014
- ✉ confidential@centralbank.ie
- 📠 Whistleblowing Desk,
Central Bank of Ireland, PO Box 11517,
Spencer Dock, North Wall Quay,
Dublin 1, D01 W920

Financial Conduct Authority (FCA)

- ☎ +44 (0)20 7066 9200
- ✉ whistle@fca.org.uk
- 📠 Intelligence Department (Ref PIDA),
Financial Conduct Authority,
12 Endeavour Square, London, E20 1JN

Prudential Regulation Authority (PRA)

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