



# AIB CODE OF CONDUCT

Living Our Values



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# MESSAGE FROM OUR CEO

Dear Colleagues,

Our Code of Conduct (“Our Code”) supports our Values and helps us to deliver on our Purpose. It does this by setting out clear expectations for how we behave and how we do business. The Code guides our behaviours and emphasises our commitment to acting ethically, honestly and with integrity while demonstrating trustworthiness. It asks us, individually and collectively, to do the right thing. By following Our Code, we will deliver for our customers and other stakeholders on a sustained basis.

We all have an obligation to comply with both the spirit and letter of our Code and to help, support and trust others to do the same. The Code cannot capture every possible situation and it falls to us to exercise good judgement and to seek guidance and support when needed. We all contribute to the Group’s culture and have a role to play to ensure our reputation is strengthened and not harmed by our conduct.

We 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 raising it with your People Leader, through our Speak Up processes. Speak Up is a core supporting pillar of our Code. I can assure you all such cases will be taken seriously, treated confidentially and investigated with the utmost professionalism. Also, please remember that no one in AIB has any authority to direct you to do something unethical or illegal.

Every employee, regardless of location or role within the Group, has an obligation to read our Code, understand it, and follow it every day. We should feel confident about our high ethical standards, our honesty, and our integrity. That responsibility sits with each and every one of us. Our Code of Conduct is a living document. The way that we behave and conduct our business every day is how we bring it to life.



**COLIN HUNT**  
AIB Chief Executive Officer



“Our Code of Conduct is a living document. The way that we behave and conduct our business every day is how we bring it to life.”

<a href="#">Message from our CEO</a>	<a href="#">Overview &amp; Responsibilities</a>	<a href="#">Our Values</a>	<a href="#">Conduct Standards</a>	<a href="#">Additional Conduct Standards</a>	<a href="#">Doing The Right Thing For Our Customers</a>	<a href="#">Doing The Right Thing In Business</a>	<a href="#">Doing The Right Thing As Employees</a>	<a href="#">Reasonable Steps</a>	<a href="#">Our Decisions – A Guiding Framework</a>	<a href="#">Sustainability &amp; Communities</a>	<a href="#">Speaking Up</a>	<a href="#">Grievances &amp; Breaches of the Code</a>	<a href="#">Governance</a>	<a href="#">Related Reading</a>
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# OVERVIEW

## PURPOSE

Our Code of Conduct ('Our Code') is based on our Values that help us deliver on our Purpose and meet our legal and regulatory obligations. Our Code sets out how we are expected to behave in a manner that is consistent with our Values and asks us, individually and collectively, to Do the Right Thing. It is not meant to provide specific guidance on every situation. Our Code is our overarching framework that informs our behaviours and decision making and encourages us to Speak Up when we see wrongdoing. Each of us has a responsibility to champion the behaviours outlined in our Code. We rely on each other to consistently apply the expected conduct standards and we support and trust each other in Doing the Right Thing.

## SCOPE

Our Code, applies to all employees who are directly employed by Allied Irish Banks p.l.c. (AIB), as well as agency staff, contractors, and Board members. This includes, for example, AIB Group (UK) plc, EBS d.a.c. (incl. Haven) and AIB Mortgage Bank. AIB Life Co., Payzone. and Goodbody Stockbrokers have their own Codes of Conduct which are aligned to the standards required in the AIB Code. All firms providing outsourced services to the Bank, must also agree to comply with this Code, or have an equally suitable proprietary Code, aligned to the required standard.

In addition to our five Conduct Standards, **all staff who service UK customers** must also adhere to the Consumer Duty-higher standard of care that was introduced by the Financial Conduct Authority (FCA) in July 2023. Details of this Conduct Standard are outlined on page 8 of this document. Additionally, for those staff impacted by the Consumer Duty regulations, all references to 'fair' outcomes within this policy should be taken as 'good' outcomes.

Our Additional Conduct Standards, apply to all ROI Pre-Approval Controlled Function (PCF) role holders and those who may exercise a significant influence on the conduct of AIB's affairs (i.e., CF1 role holders) and Senior Management Functions (SMFs).

## RAISING CONCERNS

If you have a concern about wrongdoing in AIB, including a breach of our Code, you should report your concerns to your People Leader or to another appropriate person as set out in the [Speak Up Policy](#).



## BREACHES OF THE CODE

Failure to comply with Our Code is taken seriously and investigated thoroughly. Findings of any wrongdoing or non-compliance may lead to disciplinary action up to and including role removal, dismissal, or in case of contract staff or suppliers, cancellation of contract.

In addition, staff in scope of the ROI Individual Accountability Framework / Fitness & Probity Regime or UK Senior Managers and Certification Regime, who fail to comply with the applicable Conduct Standards will also be assessed as to whether they are fit and proper to carry out their assigned role.

# RESPONSIBILITIES

## PERSONAL RESPONSIBILITIES

*Each of us has a personal responsibility to:*

- Understand and comply with Our Code and the policies and procedures that apply to our own role.
- Be accountable for our decisions and outcomes and hold others accountable.
- Comply with relevant laws and regulations.
- Consider AIB's reputation, and any potential risks to our reputation, in our daily conduct and approach to decision-making
- Seek help, guidance and advice when needed.
- Escalate or report unacceptable conduct or suspected or actual wrongdoing to your People Leader or through other appropriate channels – see the [Speaking Up](#) section of the Code. Each of us has a responsibility to escalate concerns or issues and to do so honestly, fairly and professionally.
- Complete relevant COMET and mandatory training in a timely manner and complete the declaration of compliance with our Code as part of the annual ASPIRE performance management process.
- Be aware if your role is impacted by ROI Individual Accountability Framework, Fitness & Probity Regime or UK Senior Managers and Certification Regime, which Conduct Standards apply and the reasonable steps you need to take.

## PEOPLE LEADER RESPONSIBILITIES

*People Leaders have additional responsibilities to support and embed the application of our Code throughout the bank including:*

- Regularly communicating with your teams on the importance of understanding and complying with Our Code's requirements.
- Acting as role models for and demonstrating commitment to our Code.
- Encouraging staff to Speak Up and raise concerns about wrongdoing and supporting staff who raise genuine issues or concerns.
- Ensuring concerns are resolved in a timely and fair manner and, if appropriate, are promptly escalated through appropriate channels.
- Understand how the ROI Individual Accountability Framework / Fitness & Probity Regime or UK Seniors Managers and Certification Regime impacts your role and those in your area, ensuring awareness of their obligations.

Message from our CEO	Overview & Responsibilities	Our Values	Conduct Standards	Additional Conduct Standards	Doing The Right Thing For Our Customers	Doing The Right Thing In Business	Doing The Right Thing As Employees	Reasonable Steps	Our Decisions – A Guiding Framework	Sustainability & Communities	Speaking Up	Grievances & Breaches of the Code	Governance	Related Reading
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# OUR VALUES

Our Values are how we will deliver on our purpose of **Empowering People to Build a Sustainable Future**. They are the behaviours we will live; with each other and with our customers. It takes investment of time and effort, and significant ongoing focus to understand, embed and preserve a strong organisational culture. Our Values are at the heart of our Conduct Standards and should be at the forefront of our mind when carrying out our day-to-day roles.

<p><b>Be One Team</b></p>	<p><b>Own the Outcome</b></p>	<p><b>Put Customers First</b></p>
<ul style="list-style-type: none"> <li>• Create Connections</li> <li>• Universally Include</li> </ul>	<ul style="list-style-type: none"> <li>• Seek Excellence</li> <li>• Take Accountability</li> </ul>	<ul style="list-style-type: none"> <li>• Deliver Solutions</li> <li>• Share Insights</li> </ul>
<p><b>Drive Progress</b></p>	<p><b>Show Respect</b></p>	<p><b>Eliminate Complexity</b></p>
<ul style="list-style-type: none"> <li>• Deliver Sustainability</li> <li>• Embrace Innovation</li> </ul>	<ul style="list-style-type: none"> <li>• Empower Others</li> <li>• Speak Up</li> </ul>	<ul style="list-style-type: none"> <li>• Actively Simplify</li> <li>• Be Decisive</li> </ul>



At AIB our ambition is to build a culture where colleagues are:



<p><a href="#">Message from our CEO</a></p>	<p><a href="#">Overview &amp; Responsibilities</a></p>	<p><a href="#">Our Values</a></p>	<p><a href="#">Conduct Standards</a></p>	<p><a href="#">Additional Conduct Standards</a></p>	<p><a href="#">Doing The Right Thing For Our Customers</a></p>	<p><a href="#">Doing The Right Thing In Business</a></p>	<p><a href="#">Doing The Right Thing As Employees</a></p>	<p><a href="#">Reasonable Steps</a></p>	<p><a href="#">Our Decisions – A Guiding Framework</a></p>	<p><a href="#">Sustainability &amp; Communities</a></p>	<p><a href="#">Speaking Up</a></p>	<p><a href="#">Grievances &amp; Breaches of the Code</a></p>	<p><a href="#">Governance</a></p>	<p><a href="#">Related Reading</a></p>
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# CONDUCT STANDARDS

Trust is the foundation of our business and is fundamental to maintaining the confidence of our customers, regulators and other stakeholders.

We must demonstrate and evidence our trustworthiness through our Culture, Values and Behaviours. Our Code sets out the expected conduct standards and behaviours under three pillars. When we follow these principles we demonstrate trustworthiness:

- Doing the Right Thing for our Customers
- Doing the Right Thing in Business
- Doing the Right Thing as Employees

Our five\* Conduct Standards also reflect the expectations of our regulators in the jurisdictions in which we operate. They aim to provide a sense of shared values within our organisation and empower staff to question and challenge how AIB goes about its business. These conduct standards apply to ALL staff.

Further standards (known as Additional Conduct Standards) apply to certain senior designated roles under the regulatory regimes. These are Pre-Approval Controlled Functions (PCF) and Controlled Function 1s (CF1) in ROI and Senior Management Functions (SMF) in the UK.



\*Under the UK's Financial Conduct Authority Regulation there is an additional standard applicable to UK staff and those who service UK Customers only. Details of this are available on [page 8](#)

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# CONDUCT STANDARDS

The following table outlines the Conduct Standards applicable to **ALL STAFF**, together with AIB and the regulator's expectations and outlines how we should comply with each of the standards. Staff in Pre-Approval Controlled Function roles (PCF), Controlled Function (CF) roles, Senior Management Functions (SMF) and UK Certified Roles have an obligation to take steps to ensure that they can meet the Conduct Standards, explained in more detail below (Reasonable Steps).

CONDUCT STANDARDS	1 ACT WITH HONESTY & INTERGRITY	2 ACT WITH DUE SKILL, CARE & DILIGENCE	3 BE OPEN & COOPERATIVE WITH THE CBI AND OTHER REGULATORS AND DEAL WITH THEM IN GOOD FAITH	4 ACT IN THE BEST INTERESTS OF CUSTOMERS AND TREAT THEM FAIRLY & PROFESSIONALLY	5 OBSERVE PROPER STANDARDS OF MARKET CONDUCT
AIB EXPECTATIONS	<ul style="list-style-type: none"> <li>We comply with all relevant laws, regulations, codes, standards and group policies.</li> <li>We manage conflicts of interests in line with policy.</li> <li>We only use AIB Group assets including information technology for legitimate business purposes.</li> <li>We always protect the confidentiality of information.</li> <li>We challenge things that do not seem right and Speak Up if we suspect wrongdoing.</li> <li>We provide clear and accurate information to Customers and never exert undue pressure or influence on their decision-making process.</li> <li>We promote open and honest communication, and honour our commitments to our Customers, Colleagues, the CBI and other Regulators.</li> </ul>	<ul style="list-style-type: none"> <li>We are competent and reliable in carrying out our duties in compliance with our policies, procedures and controls.</li> <li>We accept responsibility for our actions and never knowingly mislead or provide false information to Customers.</li> <li>We ensure that we have the appropriate knowledge and skills to carry out our roles and aim to improve our knowledge and skills continuously.</li> <li>We ensure that we have appropriate knowledge of the legal and regulatory framework in our jurisdiction.</li> <li>We use our knowledge base to make appropriate and well thought-out decisions in line with our policies and procedures.</li> <li>We provide sufficient clarity and oversight on delegated tasks.</li> </ul>	<ul style="list-style-type: none"> <li>We engage and proactively disclose information which the regulator would reasonably expect to receive.</li> <li>We maintain an open and constructive dialogue with our regulators and ensure all communications and responses to requests are timely and accurate, attending meetings where required.</li> <li>We act with integrity in our engagement with the regulator and never knowingly provide false or misleading information.</li> <li>We never destroy, hide or obscure information which our regulator would reasonably expect to receive.</li> </ul>	<ul style="list-style-type: none"> <li>We promote fair customer outcomes by always putting their needs first in our advice and in our decision-making.</li> <li>We consider our customers' needs and circumstances at all times when designing and offering our products and services, both digitally and in person.</li> <li>We provide customers with information which is both accessible and transparent to support and enable them in making informed decisions.</li> <li>We listen to and address customer complaints quickly and fairly and escalate to Customer Care as appropriate ensuring the customer is kept informed throughout.</li> </ul>	<ul style="list-style-type: none"> <li>We make ourselves aware of and comply with the relevant market code and stock exchange rules.</li> <li>We comply with all relevant internal policies, controls and procedures to ensure our business is conducted in line with these rules.</li> <li>We are familiar with and stay up to date on the regulatory requirements and conduct risks associated with our roles.</li> <li>We act in a fair manner and do not engage in any activity which may result in harm to AIB, our customers, other market participants or the financial system more broadly.</li> </ul>

# CONSUMER DUTY: APPLICABLE TO STAFF WHO SERVICE UK CUSTOMERS

The following table outlines the Consumer Duty’s Higher Standard of Care Conduct Standard applicable to **AIB UK STAFF AND THOSE WHO SERVICE UK CUSTOMERS**, together with AIB and the Financial Conduct Authority’s (FCA) expectations. It outlines how we should comply with this standard. Staff in Senior Management Functions (SMF) ) and UK Certified Roles also have an obligation to take steps to ensure that they can meet the Conduct Standard, explained in more detail below (Reasonable Steps).

Conduct Standard	<b>6</b> ACT TO DELIVER GOOD OUTCOMES FOR RETAIL CUSTOMERS
AIB Expectations	<ul style="list-style-type: none"> <li>We ensure customer interests are central to our culture and purpose .</li> <li>We take proactive steps to deliver good customer outcomes and avoid foreseeable harm.</li> <li>We assess the suitability of our products, following due consideration to the target market, to deliver good outcomes for customers.</li> <li>We complete ongoing monitoring to ensure our products and services continue to deliver good Customer outcomes.</li> <li>We offer products and services that meet our customer needs , provide ongoing fair value and help customers achieve their financial objectives.</li> <li>We communicate and engage with customers so they can make effective, timely and informed decisions.</li> <li>We provide support (pre- and post-sale )to our customers as and when they need it .</li> <li>We monitor and review the outcomes our customers are experiencing and act promptly to take action.</li> <li>We have a responsibility to ensure that our business strategies lead to good customer outcomes.</li> <li>We act to avoid foreseeable harm, removing any unreasonable barrier for our customers.</li> </ul>

## Consumer Duty Explained

The FCA Consumer Duty-higher standard of care is now introduced in the UK. The UK’s Financial Conduct Authority (‘FCA’) implemented its most recent consumer protection regulation Consumer Duty (‘the Duty’) across the UK in July 2023. It is considered by the FCA to be a “paradigm shift” in raising the standard of care provided to retail customers. Under the Duty we have an obligation to ensure that not only do we deliver good customer outcomes, but we evidence, assess, and monitor these outcomes throughout the product lifecycle.

The overarching consumer principle requires us to ‘act to deliver good outcomes for retail customers’. This is underpinned by three cross-cutting rules , we act in good faith, we avoid causing foreseeable harm and we enable and support retail customers to pursue their financial objectives. In addition, there are four outcomes which set out more detailed expectations for our conduct in the following key areas; governance of products and services, price and value, consumer understanding, and consumer support. This Code supports and reflects this higher standard of care.

Further guidance on how to deliver good outcomes for our Customers is available under the Doing the Right Thing For Customers section of this document and on the [FCA Website](#).

**Note:** For all UK colleagues and those who service UK Customers, all references to ‘fair’ outcomes within this policy should be taken as ‘good’ outcomes as part of the Consumer Duty regulations.

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# ADDITIONAL CONDUCT STANDARDS

The following table outlines the Additional Conduct Standards applicable to **ROI staff in Pre-Approval Controlled Functions (PCFs) roles and Controlled Function 1s (CF1) and UK staff who are impacted by the Senior Managers and Certification Regime**, together with AIB and the regulators' expectations for each of the standards.

Staff in PCF, CF1 and SMF roles have an obligation to take steps to ensure that they can meet the Additional Conduct Standards, explained in more detail below (Reasonable Steps).

ADDITIONAL CONDUCT STANDARDS	1 CONTROL BUSINESS AREA EFFECTIVELY	2 CONDUCT BUSINESS IN ACCORDANCE WITH RULES AND REGULATIONS	3 DELEGATE TASKS APPROPRIATELY AND EFFECTIVELY	4 DISCLOSE INFORMATION PROMPTLY AND APPROPRIATELY
AIB EXPECTATIONS	<ul style="list-style-type: none"> <li>We fully understand our business area and keep ourselves informed of any developments (including business and regulatory developments) which impact it.</li> <li>We actively participate in the collective decision-making process, provide rational challenge and keep ourselves informed.</li> <li>We maintain effective frameworks, policies, procedures and controls to identify and monitor risks within our business area.</li> <li>We carefully consider any recommended system or control improvements.</li> <li>We ensure that policies and procedures are in place to appropriately review the competence, knowledge, skills and performance of employees in our business area.</li> <li>We carefully review whether colleagues who report to us should continue in their roles if their performance is deemed unsatisfactory, particularly in cases of potential non-adherence to applicable controls, rules and regulations.</li> <li>We ensure that reporting lines are clear and that we communicate transparently.</li> <li>We ensure efficient handover of roles and that we engage in appropriate succession planning.</li> </ul>	<ul style="list-style-type: none"> <li>We ensure our business area has up to date policies and procedures to maintain operational effectiveness of controls which include clear steps for complying with relevant regulatory requirements.</li> <li>We ensure our colleagues are aware of the need to comply with relevant regulatory requirements and have appropriate training to allow them to do so.</li> <li>We proactively address any potential regulatory breaches (by individuals, an AIB entity, or AIB Group as a whole), implement clear and comprehensive plans to investigate, and communicate to regulators as appropriate.</li> <li>We seek legal advice, as appropriate, if issues arise in the course of our duties which raise questions of law or regulatory interpretation.</li> <li>We ensure appropriate arrangements are in place to maintain compliance with regulatory requirements when overseeing colleagues in temporary roles.</li> <li>We proactively and thoroughly remediate regulatory breaches, assess any lessons learned, and ensure necessary procedures are put in place to prevent reoccurrence.</li> </ul>	<ul style="list-style-type: none"> <li>We retain overall responsibility and accountability if we delegate tasks to colleagues including colleagues operating in different entities or branches.</li> <li>We exercise due and reasonable consideration when determining which colleague or colleagues we delegate tasks to.</li> <li>We only delegate tasks to colleagues who have sufficient knowledge, expertise, skills and capacity to competently fulfil the task.</li> <li>We give the delegate a clear understanding of what is expected of them and maintain consistent oversight and distinct reporting lines.</li> <li>We ensure appropriate controls and systems are in place to mitigate any risks associated with delegated tasks including appropriate systems to effectively escalate and address issues as necessary.</li> </ul>	<ul style="list-style-type: none"> <li>We act in an open and co-operative manner with our regulators.</li> <li>We respond to any requests for information from our regulators in a timely fashion.</li> <li>We promptly and appropriately disclose any information which our regulators would reasonably expect notice of regardless of whether they have asked for it.</li> <li>We maintain processes and controls to identify potential issues within our area of responsibility and keep a record of all considerations taken in respect of reporting those issues to our regulators.</li> <li>We promptly make enquiries about issues that come to our attention and ensure that relevant actions have been taken.</li> </ul>

# DOING THE RIGHT THING FOR OUR CUSTOMERS

Our purpose is to empower people to build a sustainable future. We challenge ourselves to always make decisions based on the right thing to do for our customers, always treating our customers fairly and with respect. We do so with competence, honesty and reliability.

## We demonstrate and evidence our trustworthiness when we:



WE ARE  
TRUSTWORTHY

- Listen to our customers to understand their needs, and take action to improve their journey with us.
- Promote fair customer outcomes by always putting their needs first in our advice and in our decision making.
- Design products and services that are suitable for our customers' needs and that align with our purpose of delivering sustainable outcomes.
- Provide ongoing fair value and help our customers achieve their financial objectives.
- Provide customers with information which is both accessible and transparent to support and enable them in making informed decisions.
- Listen to and resolve customer complaints quickly and fairly, escalating to Customer Care as appropriate.
- Provide professional advice to a customer only if we are appropriately qualified and specifically authorised to do so on behalf of AIB.
- Support and protect our customers in vulnerable circumstances or in financial difficulty.
- Keep our communications simple, clear and transparent.

## We do this by taking the following actions:



WE ARE  
RESPONSIBLE

- Acting with due skill, care and diligence. This requires us to perform our duties competently and reliably in compliance with policies, procedures and controls.
- Acting honestly, ethically and with integrity – core elements in generating trustworthiness.
- Accepting responsibility for our actions, lack of action or errors.
- Understanding our role, activities and responsibilities, and what reasonable steps we may need to take in the course of our day-to-day role.
- Holding ourselves and others accountable.
- Continually improving our skills and knowledge to perform our job responsibilities.
- Applying prudent risk management in our decision making.
- Honouring our commitments to all our stakeholders.
- Encouraging open, honest communication, and seeking different perspectives and views to limit bias.
- Acting with due consideration for sustainability and the long-term impacts of our decisions.
- Ensuring we educate ourselves and are diligent in recognising, supporting and communicating effectively with customers in vulnerable circumstances to ensure they receive as fair an outcome as other customers.

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# DOING THE RIGHT THING IN BUSINESS

We value sustainable long-term relationships. We manage our business and deliver outcomes through responsible business practices and prudent risk management. Our long-term sustained commitment and performance help build trust with our clients, in each other, and in our communities.

## We do this through:



### COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

- We comply with both the spirit and letter of all relevant laws, regulations, codes and AIB policies. If there is anything inconsistent between laws and regulations and our policies, we apply the highest obligation. If in doubt, you should escalate to your People Leader.
- We believe in open and fair competition. We engage in practices that are legal and ethical. We do not engage in anti-competitive practices and we do not engage in or permit market manipulation.
- We are always open, constructive and co-operative with our regulators and we respond promptly and accurately to regulatory requests for information.



### ANTI-MONEY LAUNDERING

- We are committed to preventing the use of our products or systems to launder criminal proceeds, to finance terrorism, to evade taxation, or to bypass applicable sanctions laws.



### BRIBERY, CORRUPTION & FRAUD

- We never engage in any form of bribery or corruption.
- We are alert to any indications of fraud and other financial crime, and we escalate and report them promptly.



### RISK MANAGEMENT

- Each of us is responsible for recognising and addressing risk in a prudent manner. We apply appropriate diligence in assessing risks in our decision making.
- If, under the Individual Accountability Framework / Fitness and Probity Regime, we hold a Pre Approval Controlled Function or Controlled Function 1 role, or are subject to the UK Senior Managers and Certification Regime we should ensure that the relevant systems, controls and procedures are in place to monitor and identify risks in the area that we are responsible for.









### CONFIDENTIAL INFORMATION

- We are entrusted with information from many sources in the course of our business and this carries significant obligations of confidentiality and security.
- We respect and protect the privacy and confidentiality of information in all its forms of our customers, our employees, our suppliers, AIB Group and third parties with whom we do business.
- Our duty of confidentiality obligation continues if we leave the AIB Group.

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# DOING THE RIGHT THING IN BUSINESS

 <p><b>AIB ASSETS</b></p>	<ul style="list-style-type: none"> <li>• We only use AIB Group assets, including information technology and systems, for legitimate business purposes.</li> <li>• We protect assets to which we have access to in accordance with our policies.</li> <li>• We maintain high standards of physical, information and digital security.</li> </ul>	 <p><b>LOBBYING</b></p>	<ul style="list-style-type: none"> <li>• We do not undertake formal or informal lobbying activities to public officials on behalf of AIB unless specifically authorised to do so in accordance with the Lobbying Policy. Lobbying includes attempting to influence legislation or government decisions.</li> </ul>
 <p><b>CONFLICT OF INTERESTS</b></p>	<ul style="list-style-type: none"> <li>• Our judgement and decision making should be free from conflicts of interest or undue influence of others. We must be alert to potential conflicts of interest, actual or perceived between our personal interests and the interests of AIB including our customers, shareholders and suppliers. Where we cannot avoid such conflicts, we follow procedures outlined in our <a href="#">Conflicts of Interest Policy</a> some relevant examples include:</li> <li>• We do not misuse information or inappropriately disclose inside information for our own benefit or for the benefit of others including sending information to our personal email account.</li> <li>• We do not offer, solicit or accept gifts or entertainments which might influence or be seen to influence our business judgement.</li> <li>• We do not let outside business activities interfere with the interests of AIB, our customers or our ability to carry out our duties and responsibilities to the bank - always seek prior approval from your People Leader.</li> <li>• We do not deal with, access or process any banking transaction either for ourselves or for a person with whom we have a personal relationship.</li> </ul>	 <p><b>FREEDOM OF ASSOCIATION</b></p>	<ul style="list-style-type: none"> <li>• We recognise our colleagues’ right to freedom of association<sup>1</sup> and to participate constructively in dialogue with trade unions recognised by AIB.</li> </ul>
		 <p><b>PARTICIPATING IN THE POLITICAL PROCESS</b></p>	<ul style="list-style-type: none"> <li>• While we may involve ourselves in political issues and campaigns as our consciences and beliefs dictate, we are careful in ensuring that it does not involve the use of any AIB resources, is undertaken outside of working hours, and we do not represent our views as those of AIB.</li> </ul>
		 <p><b>RECORDS &amp; ACCOUNTS</b></p>	<ul style="list-style-type: none"> <li>• We maintain accurate and complete records and accounts of our dealings with customers and suppliers.</li> </ul>

<sup>1</sup>As per ILO Convention C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87).

<a href="#">Message from our CEO</a>	<a href="#">Overview &amp; Responsibilities</a>	<a href="#">Our Values</a>	<a href="#">Conduct Standards</a>	<a href="#">Additional Conduct Standards</a>	<a href="#">Doing The Right Thing For Our Customers</a>	<a href="#">Doing The Right Thing In Business</a>	<a href="#">Doing The Right Thing As Employees</a>	<a href="#">Reasonable Steps</a>	<a href="#">Our Decisions – A Guiding Framework</a>	<a href="#">Sustainability &amp; Communities</a>	<a href="#">Speaking Up</a>	<a href="#">Grievances &amp; Breaches of the Code</a>	<a href="#">Governance</a>	<a href="#">Related Reading</a>
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# DOING THE RIGHT THING AS EMPLOYEES

Our success depends on ourselves, **whether as an employee or a contractor**, and how we work together. This requires trust and we build trustworthiness through our own accountability and delivering on our responsibilities, through collaboration with our colleagues and treating each other with courtesy, respect and fairness. We foster open and effective working relationships both within our teams and across different business areas, based on the Value that we are One Team. We value diversity as a strength and do not tolerate any form of discrimination or harassment.

## We do this through:



### VALUE COLLEAGUES

- We treat each other courteously and with care, respect, dignity and fairness at all times – as we would like to be treated, and we hold each other to high standards of personal behaviour.
- We proactively collaborate with colleagues and share knowledge, ideas and skills. Effective collaboration enables better outcomes.



### SOCIAL MEDIA

- We use good judgement in the use of social media and comply with all applicable policies.
- We do not comment on behalf of AIB unless we are authorised to do so and we ensure that our use of social media does not interfere with our work.



### WORK ENVIRONMENT

- We all have responsibilities to ensure that we provide a safe and secure workplace where we contribute, develop, challenge and express ourselves in a professional and respectful manner.
- We uphold high standards of physical health & safety in our workplaces.
- We do not tolerate any behaviour that creates an intimidating, offensive, hostile or disrespectful workplace including but not limited to, offensive conduct, derogatory jokes or comments or unwanted sexual advances. We should always consider how others might react or perceive our words or actions.



### INCLUSION & DIVERSITY

- We will create an inclusive working environment and seek to prevent any form of harassment or bullying. We report and act on any allegations of harassment or bullying in the workplace.
- We value and embrace diversity and oppose all forms of discrimination (race, ethnicity, age, colour, gender, sexual orientation, disability, creed or any other classifications protected under applicable laws). Diversity draws on different experiences and perspectives, reduces the risk of groupthink, adds value, and contributes to better outcomes.

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# DOING THE RIGHT THING AS EMPLOYEES



## ACCOUNTABILITY

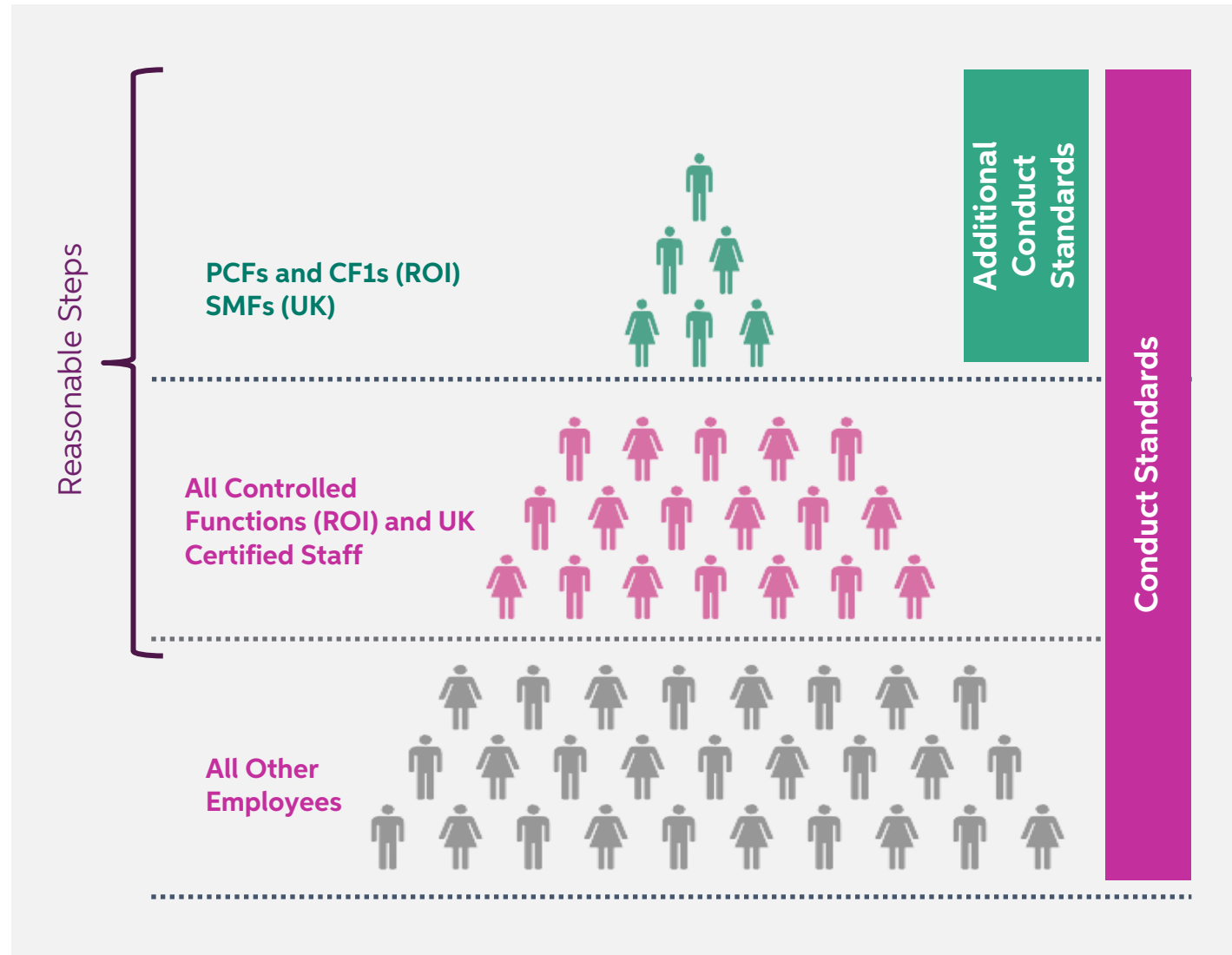
- We take personal accountability for our actions and outcomes and hold others accountable. We challenge in a professional and respectful manner and are open to being challenged ourselves.
- We represent AIB only when authorised, and we do not talk about AIB, our customers or our colleagues directly with the media or through any social media channel, unless authorised to do so.
- We do not tolerate deliberate misconduct or breach of our Code or policies - in ourselves or in others and we escalate or Speak Up on such issues honestly, fairly and professionally. We also recognise our responsibility to report wrongdoing or suspicions of wrongdoing, and we respond and act on these reports. We respect and protect the person who reports their suspicion to us.
- Any breaches of our Code/behavioural issues, including non-completion of mandatory training are recorded in our ASPIRE performance management process.
- We claim, record and approve expenses appropriately and in line with policy.
- We each conduct our personal financial and tax affairs responsibly so as not to bring ourselves or AIB into disrepute.
- We recognise the necessity for process discipline in following our policies, procedures, controls and governance pathways. We are committed to addressing errors, flaws or breaches in a timely manner, failing which we ensure that they are escalated and reported so that they can be fixed.
- Where we delegate activities, we do so appropriately, providing effective oversight and adequate support to our colleagues.
- We participate appropriately and actively in the collective decision-making process, ensuring sufficient level of preparation and attendance, access to relevant information and exercising sound judgement.
- We ensure key decisions are documented appropriately.
- We understand our role and the relevant Conduct Standards that apply to us.



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# REASONABLE STEPS

Under IAF and UK SM&CR, a person performing Pre-Approval Controlled Function role, Controlled Function role, ) UK Certified Roles and/or is a Senior Management Function in the UK, has a regulatory requirement to take reasonable steps to ensure that the Conduct Standards are met. Reasonable steps are “any steps that it is reasonable in the circumstances for the person to take”. These steps should be considered and acted upon consistently.



## Examples of Reasonable Steps

Below are some examples of the reasonable steps you may take when adhering to the Conduct Standards. For further details please consult the Reasonable Steps Framework available on the HR Hub.

### All Controlled Function and UK Certified role holders :

- Understand your own role and responsibilities.
- Ensure you have the appropriate knowledge and skills to carry out your role.
- Put the Customers interests first and at the centre of your approach, ensuring you deliver fair customer outcomes.
- Undertake appropriate training throughout the year.
- Ensure issues are raised through the appropriate escalation channels.
- Knowledge of key risks that may impact their role and business area.

### Pre-Approved Controlled Function (PCF), Controlled Function 1 (CF1) role holders and UK Senior Management Function (SMFs):

- Ensure you have appropriate controls and processes in place, across your area of responsibility
- Understand your role in relation to effective collective decision making.
- Steps you have taken to assess, monitor and review the adequacy and effectiveness of the governance, operational and risk management arrangements in place.
- Ensure delegation is to an appropriate delegate with the required capacity, competence, knowledge, seniority and skill.
- Steps undertaken to establish clear reporting lines in your Business Area.
- Review and challenge the relevancy, accuracy and completeness of information available to you.

# OUR DECISIONS - A GUIDING FRAMEWORK

We are accountable for our decisions and their outcomes. When faced with a challenging situation or decision, where we are uncertain of the appropriate course of action or where something does not feel quite right, we should use the questions in the framework to help guide us to make better decisions. This is not a decision tree, and the questions are in no particular order. Some of the questions may not apply or have less relevance to every decision we make. If in doubt, consult with your People Leader.

## IS IT IN THE CUSTOMER'S BEST INTEREST?

- Would the perception of our decision be viewed as a fair outcome by our customers or wider third parties?
- Does it sustain long term relationships over short term gains?



## DOES IT COMPLY WITH RELEVANT LAWS, REGULATIONS & OUR POLICIES?

- Are we in compliance with both the spirit and letter of the laws, regulations and our policies including our Code of Conduct?



## DOES IT CREATE VALUE FOR THE CUSTOMER, AIB & WIDER SOCIETY?

- What are the implications and who is impacted?
- Do we understand the risks?
- Are we balancing short and long-term implications?



## WOULD YOU FEEL COMFORTABLE IF IT WAS MADE PUBLIC?

- We are accountable for our decisions and outcomes.
- Would we have a clear conscience in explaining the decision if it became publicly available or if we had to explain it to a family member, friend or colleague?



## WOULD IT CAUSE HARM TO AIB'S REPUTATION?

- Are we acting with due skill, care and diligence and applying prudent risk management in our decision making?



## SUPPORTING INFORMATION

- The IBCB have developed a complementary "DECIDE" framework to assist with ethical decision making. Further info is available at [www.irishbankingcultureboard.ie](http://www.irishbankingcultureboard.ie)

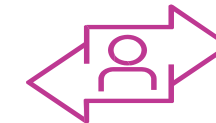
## ARE WE DOING THE RIGHT THING?

- Are we acting fairly and transparently?
- Have we assessed all the options, risks and impacts?
- Have we sought different perspectives to inform our decision? If time permits this could be important particularly in a remote working environment.
- Have we sought help and guidance if still unsure?



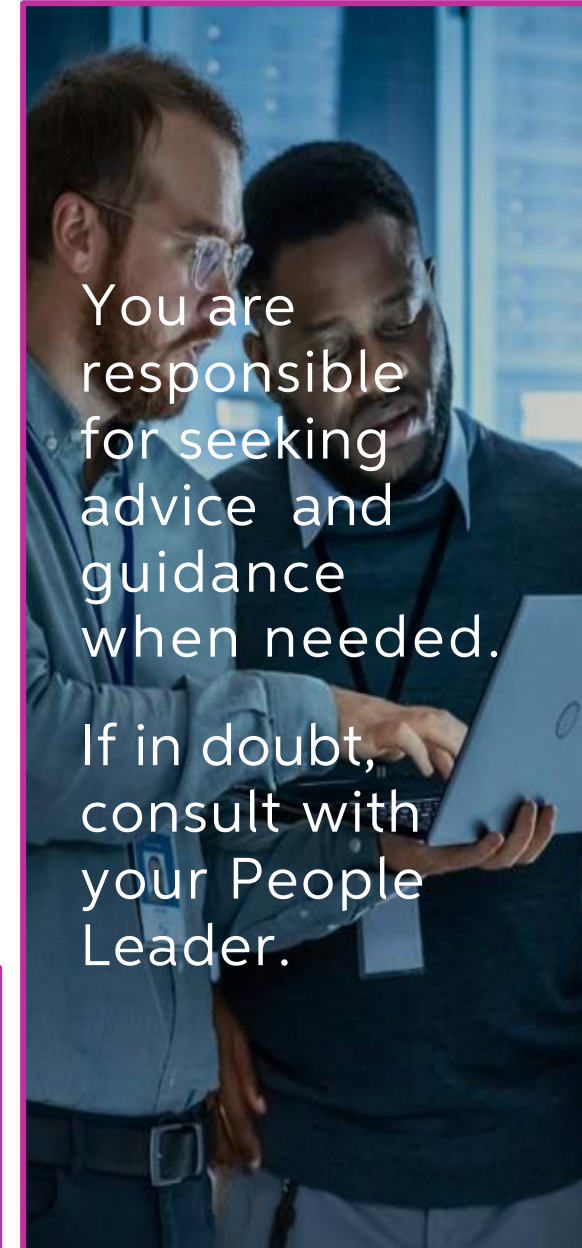
## IS THERE AN ACTUAL OR PERCEIVED CONFLICTS OF INTERESTS?

- Are we avoiding any conflicts of interest? If we cannot, we must put steps in place to address them transparently and in line with our Conflicts of Interest Policy.
- Are we making this decision to fit in or avoid conflict or are we being influenced based on the expectations of our peers/People Leader?



## HAVE YOU TAKEN THE REASONABLE STEPS?

- For those of us impacted by the Fitness & Probity Regime in ROI (i.e., Pre-Approval Controlled Function and Controlled Function roles) or by the UK Senior Managers and Certification Regime (Senior Management Function), have we taken reasonable steps to avoid breach of the applicable Conduct Standards from occurring or continuing?
- Have we referred to our Reasonable Steps Framework to seek help and guidance if still unsure?



You are responsible for seeking advice and guidance when needed. If in doubt, consult with your People Leader.

Message from our CEO	Overview & Responsibilities	Our Values	Conduct Standards	Additional Conduct Standards	Doing The Right Thing For Our Customers	Doing The Right Thing In Business	Doing The Right Thing As Employees	Reasonable Steps	<b>Our Decisions – A Guiding Framework</b>	Sustainability & Communities	Speaking Up	Grievances & Breaches of the Code	Governance	Related Reading
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# PROMOTING SUSTAINABILITY & SUPPORTING OUR COMMUNITIES

AIB's purpose is empowering people to build a sustainable future, and sustainability is at the heart of our Group strategy. We want to make a positive impact, creating long-term value in our business as well as the economies and communities in which we live and work.

## We do this through:

- Putting our customers first, always treating them fairly and with respect.
- Continuing to proactively contribute to a robust and sustainable future economy and society
- Lending responsibly and steering our portfolios towards net zero by 2040 (Agriculture by 2050).
- Reaching net zero in own operations by 2030.
- Deploying our 2030 €30bn Climate Action Fund supporting our customers in the transition to a low-carbon economy.
- Funding renewable energy and sustainable infrastructure projects.
- Providing products and services to help make a positive environmental impact.
- Ongoing education and support for our colleagues and wider customer base to support the transition to a low carbon future.
- Continuing to embed ESG capabilities and measures at the heart of our business.
- Encouraging and supporting involvement in community, charitable and educational activities



## HUMAN RIGHTS & MODERN SLAVERY

AIB is committed to the protection and preservation of human rights. We published our [Human Rights Commitment](#), pledging to respect human rights in accordance with internationally accepted standards. We respect human rights in accordance with internationally accepted standards; our Human Rights Commitment has been shaped by the UN Guiding Principles on Business and Human Rights. Our commitment operates alongside our Code of Conduct and Responsible Supplier Code, and is aligned to the European Convention on Human Rights and the EU Charter of Fundamental Rights. We actively avoid causing, financing or contributing to any business activity that is known to breach human rights or fair practices, including taking steps to address any situations we become aware of where this has occurred. Due diligence is undertaken so that the organisation has an adequate knowledge of its customers, thus mitigating the risk of generating negative impacts on human rights caused by its products and/or services.

Our [Responsible Supplier Code](#) sets out our expectation that our suppliers must abide by all national and international laws as applicable, including the International Bill of Human Rights and the International Labour Organisation conventions. In line with our Responsible Supplier Code, we do not partner with or buy from organisations which we know to breach human rights or fair practices. We report annually on our approaches to tackling modern slavery in our [Modern Slavery Statement](#). We ensure non-discrimination among our employees and customers due to gender, marital status, family status, age disability, sexual orientation, race, religion; or on any other grounds where discrimination is prohibited under local law.

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# SPEAKING UP

**Every organisation faces the risk that something will go wrong either accidentally or otherwise. It is very important that we hear about such things, at an early stage, so we can fix them.**

Each of us has a direct responsibility to raise a concern if we believe something may be wrong. Equally we have a responsibility to listen and follow up on such concerns. It's really important that we all can safely report these issues without any adverse consequences, and that we are confident that our concerns will be listened to and acted upon.

In the first instance we should feel confident that we can raise issues confidentially with our People Leader or with a more senior People Leader within our business area, without fear of penalisation. But if we do not wish to report this way or believe that our report of a concern is not being properly investigated and actioned; then we can raise our concern through the confidential Speak up process.

In certain roles namely, Pre-Approval Controlled Functions (ROI) and Senior Managers and Certification Regime (UK), we may also have additional regulatory disclosure responsibilities.

We can also seek confidential advice from our dedicated internal Speak Up team and/or Protect, an independent external third party who provide free legal advice to AIB staff who wish to Speak Up.

We can read how to go about Speaking Up, and what protection we will be provided, in our [Speak Up Policy](#)



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# GRIEVANCES

If you feel that you have been personally mistreated or have been subject to behaviours which you believe are contrary to our Code, you can raise your concerns either informally with your People Leader or more formally through AIB's Grievance Policy.

Our Workforce Performance team are available at [workforce.performance@aib.ie](mailto:workforce.performance@aib.ie) if you have any queries on this.



# BREACHES OF OUR CODE

We will consider and investigate potential breaches. We take breaches seriously and any breaches may be addressed under our disciplinary policy and procedures. This can include sanctions up to and including role removal, or dismissal or the reduction or removal of remuneration. The Workforce Performance Team in HR provides advice and manages these processes and procedures.

- Breaches may be addressed under our disciplinary policy and procedures and findings of any wrongdoing or non-compliance may lead to disciplinary action up to and including dismissal, or in case of contract staff or suppliers, cancellation of contract.
- Depending on the nature and severity of the breach AIB may also be obligated to report this to the relevant regulator or law enforcement authority.
- For Fitness & Probity and Senior Managers and Certification Regime impacted staff, any disciplinary issue raised (including breaches of the Code of Conduct), may also result in a Fitness & Probity Assessment i.e., to assess if the individual is fit and proper to continue in their Pre-Approval Controlled Function and/or Controlled Function roles.



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# GOVERNANCE



The Code is periodically reviewed by the AIB Group Board and annually by the Group Conduct Committee and by the Board Audit Committee. An annual report is provided to the AIB Group Board on the awareness levels of the Code, aspects for review, and any breaches which have been identified and action taken.



The Three Lines of Defence Model is used to monitor and govern compliance with the policies that underpin this Framework. Where there are concerns about suspected breaches of our Code or suspected wrongdoing, the [Speak Up Channel](#) can also be used to report concerns.

All Code of Conduct breaches should be reported to your People Leader or escalated to the Speak Up Team via [speakup@aib.ie](mailto:speakup@aib.ie)

**Policy Implementation date:** July 2012  
**Last Review Date:** July 2024  
**Last Updated With Changes:** July 2024  
**Policy is Reviewed:** Annually or If changes required by legislation or the business.  
**Next Review Date:** 2025  
**Policy Owned by:** Head of Group Accountability & Performance  
**ExCo Policy Sponsor:** Chief People Officer  
**Approval Authority:** Group Board Audit Committee

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# RELATED READING

Our Code of Conduct is a framework underpinned by a number of key policies and processes across our Three Pillars. Further information on some of these are provided below and the full suite can also be accessed on the [AIB Group intranet site](#).

The Code is also aligned to the Central Bank of Ireland's Individual Accountability Framework and the UK FCA's Senior Managers and Certification Regime. Further information on this can be found on the [Central Bank's Website](#) and the [FCA Website](#).

**Note:** Some business segments have local policies and procedures which support and expand on the relevant Group Policies, and which should also be referred to as required.

## OUR CUSTOMERS

- › [Conflicts of Interest](#)
- › [Data Protection](#)
- › [Anti-Bribery & Corruption](#)  
(see section within the Financial Crime Policy)
- › [AIB Vulnerable Customer Guidelines](#)

## OUR BUSINESS

- › [Regulatory Compliance](#)
- › [Group Regulatory Compliance Risk Management Framework](#)
- › [Group Conduct Risk Policy](#)
- › [Regulatory Compliance Risk Management Policy](#)
- › [Financial Crime Policy](#)
- › [Reputational Risk Framework](#)
- › [People, Property & Protection](#)
- › [Information Security](#)
- › [Health & Safety Statement](#)

## OUR EMPLOYEES

- › [Regulatory Accountability Policy](#)
- › [Speak Up Policy](#)
- › [Anti-Bullying & Harassment Policy](#)
- › [Inclusion & Diversity Code](#)
- › [Disciplinary Policy](#)
- › [Grievance Policy](#)
- › [Social Media Policy](#)
- › [Organisation of Working Time Rol](#)
- › [Recording of Working Time UK](#)
- › [Annual Leave Policy](#)
- › [Sickness Absence Management Policy](#)
- › [Conduct of Personal Financial Affairs](#)
- › [Expenses Policy](#)
- › [Group Dealing Code](#)
- › [Aspire Performance Management](#)
- › [Agile and Working From Home Policy](#)
- › [Remuneration Policy](#)

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