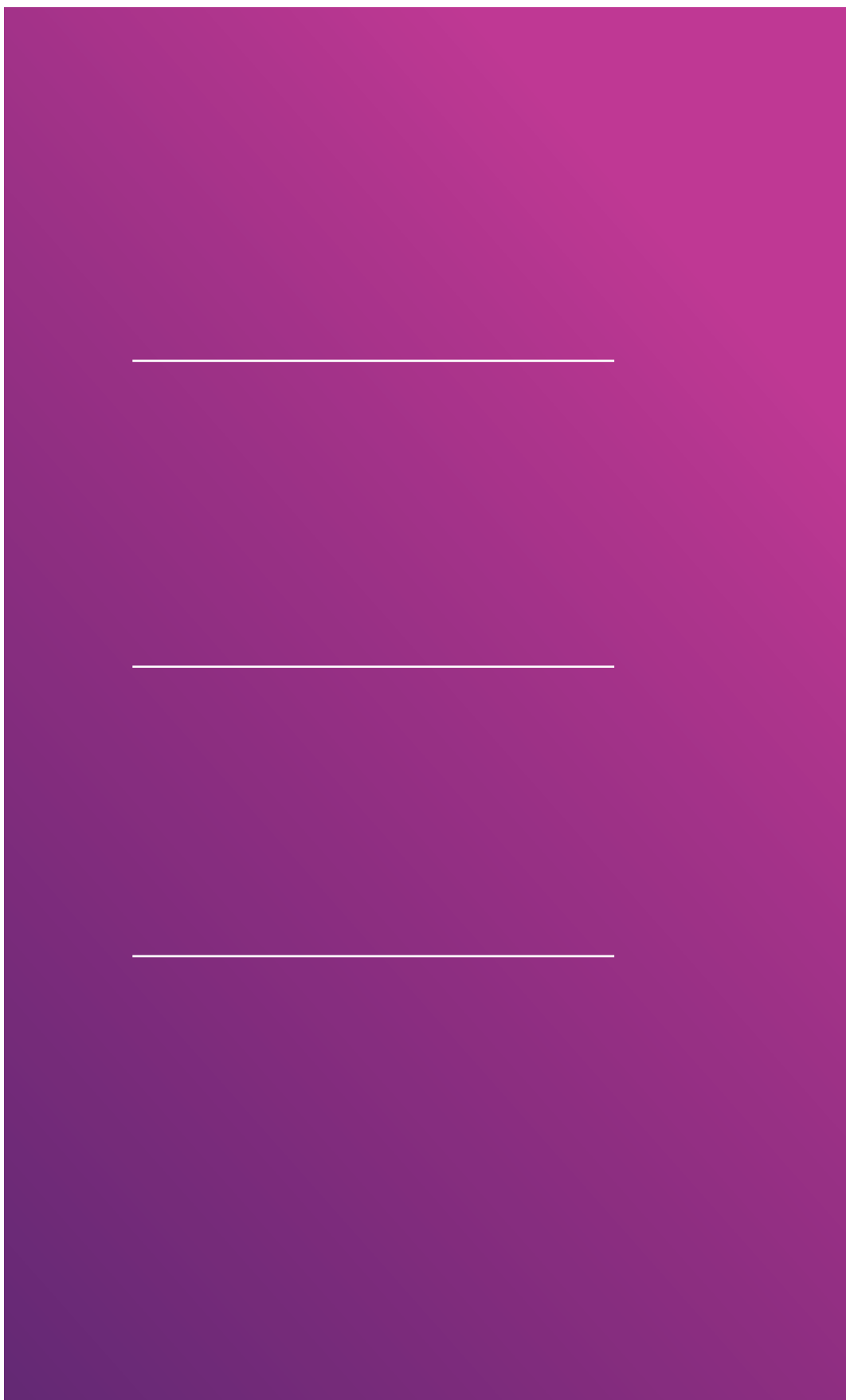


AIB Responsible Supplier Code

October 2020

AIB Group plc





POLICIES AND PROCEDURES

RAISING CONCERNS

OUR COMMITMENT

HUMAN RIGHTS

HEALTH, SAFETY AND WELFARE

SUPPLY CHAIN

DIVERSITY AND INCLUSION

DOING BUSINESS RESPONSIBLY

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I am pleased to endorse our Responsible Supplier Code.

In AIB, we have made an external commitment that **'We Pledge to Do More'**; we want to lead Ireland's transition to become a low-carbon economy. Sustainable Communities has been added as the fifth pillar in AIB's 3 year Group Strategy (2020 – 2022). This means challenging ourselves to deliver meaningful social and economic value to our Customers and our Communities.

We want to do business responsibly and sustainably, and to live by our economic, social, ethical, and environmental values. We want to focus on meeting the needs of the present without compromising the ability of future generations in meeting their needs. We want to support societal progress and an increase

"WE WANT TO DO BUSINESS WITH SUPPLIERS THAT HAVE THE SAME VALUES, AND THAT OPERATE IN THE SAME RESPONSIBLE AND SUSTAINABLE MANNER."

in the quality of life. We want to do business with suppliers that have the same values, and that operate in the same responsible and sustainable manner.

We seek to work with likeminded suppliers to achieve these goals. This Code identifies our expectations of you, all your stakeholders, employees, subcontractors and any other third parties, whilst detailing what you can expect from us in return. We would welcome you sharing this code, values and aspirations, and contribute to our mutual success.

We are always keen to hear about how we can work better together, including ideas on areas relating to improvements in processes, responsible business, or sustainability. Together, we can do more, we can do business responsibly, and lead a transition to a more sustainable economy.

COLIN HUNT
AIB Chief Executive Officer,
October 2020

PURPOSE AND SCOPE

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

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

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



**[CLICK HERE, TO LEARN MORE ABOUT
BECOMING ONE OF OUR SUPPLIERS ONLINE](#)**



OUR ORGANISATION

AIB Group is a financial services provider that operates mainly in the Republic of Ireland but through its subsidiaries also has branches and undertakes activities in the United Kingdom. We employ 9,520 staff across 325 locations. With over 2.8 million customers, AIB holds a distinctive role and responsibility in Irish society, with a unique opportunity to make both a meaningful and positive impact in an increasingly challenging and complex world.

We have circa 3,800 suppliers which we segment across five different tiers that differentiate scale and complexity of business. Each segment attracts a different supplier treatment strategy appropriate to the scale and criticality.

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

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



OUR VALUES AND BEHAVIOURS

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

BE ONE TEAM



Breakdown silo's by focusing on group results. Bring your best self to work. Work in a transparent and collaborative manner. Share stories and learnings with peers.

OWN THE OUTCOME



Consider the long term implications of every decision. Drive for excellence in everything you do. Be accountable and cast a positive shadow. Deliver fair outcomes.

DRIVE PROGRESS



Develop a growth mindset by being curious with thoughts and courageous with challenge. Cultivate a climate where everyone feels safe to share their concerns or ideas. Always consider the customer in every decision.

SHOW RESPECT



Respect the views and opinions of colleagues and stakeholders. Understand the organisation and its operation. Recognise the necessity for process discipline. Engage in an open and honest manner.

ELIMINATE COMPLEXITY



Simplify how we do things by challenging our operating norms. Be resilient towards mistakes and failures and encourage learnings from them. Be quick to act and make decisions with the customer front of mind.

OUR APPROACH TO RESPONSIBLE BUSINESS AND SUSTAINABILITY



OUR APPROACH TO RESPONSIBLE BUSINESS AND SUSTAINABILITY

Over the last number of years we have been working to build a more sustainable business. We've invested in wind energy projects, launched a €5 billion climate action fund and created a green mortgage. And yet, it's still not enough. And we will keep telling ourselves that every day.

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

WE PLEDGE TO DO MORE

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

Our **Responsible Supplier Code** sets out expectations for suppliers, and the key social, ethical and environmental values to abide by. We want to support an inclusive and

ethical supply chain, and ensure that individuals and companies throughout our supply chain work responsibly, sustainably, and safely.

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

Suppliers are expected to comply with the content of this Code, along with all applicable laws, regulations and standards in the countries in which business is conducted. Suppliers may be asked to provide a written attestation agreeing that they have read, understand and will abide by the terms of this Code.

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

“WE WANT TO SUPPORT AN INCLUSIVE AND ETHICAL SUPPLY CHAIN, AND ENSURE THAT INDIVIDUALS AND COMPANIES THROUGHOUT OUR SUPPLY CHAIN WORK RESPONSIBLY, SUSTAINABLY, AND SAFELY.”



CLICK HERE TO FIND OUT MORE ABOUT OUR SUSTAINABILITY STRATEGY



VIEW OUR CODE OF CONDUCT BY CLICKING HERE



LEARN MORE ABOUT FSQS BY CLICKING HERE, AND VIEWING THE ‘HOW TO BECOME ONE OF OUR SUPPLIERS’ SECTION

POLICIES AND PROCEDURES



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

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



OUR CODE OF CONDUCT

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

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

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

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

OUR ANTI BRIBERY AND CORRUPTION POLICY

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

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

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

OUR CONFLICTS OF INTEREST POLICY

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



CLICK HERE, TO READ ALL OF OUR POLICIES AND PROCEDURES

RAISING CONCERNS

Every organisation faces the risk that something will go wrong either accidentally or otherwise. We may have a suspicion about a breach of law or regulation, or a concern about a danger, risk, malpractice or general wrongdoing, including a deliberate breach of our Code of Conduct.

It is very important we hear about such things at an early stage, so we can fix them. We have a number of mechanisms in place for raising concerns, including our Speak Up (whistleblowing) process.

OUR SPEAK UP POLICY

Our policy provides guidance on the process for reporting wrong doing or suspected wrongdoing through a number of channels, without fear of, or actual retaliation, including:



Suppliers can contact their appointed AIB supplier manager or business contact to avail of a confidential internal contact number. Alternatively suppliers can **Speak Up** via a confidential email address speakup@aib.ie



Protect are an independent specialist charity that offer an external, confidential facility to raise concerns. Suppliers that prefer to raise concerns via Protect can access their helpline on **+0044 (020) 3117 2520** or find out more here: www.protect-advice.org.uk/advice-line/



FIND OUT MORE ABOUT HOW YOU CAN RAISE A CONCERN BY READING OUR SPEAK UP POLICY



OUR COMMITMENT

AIB is committed to a number of international and national codes and standards relating to responsible business and sustainable practice. These include:



The Carbon Disclosure Project (CDP), which aims to incentivise and guide companies on a journey through disclosure towards becoming a leader on environmental transparency and climate action. In 2019, over 8,400 companies disclosed information on climate measures through CDP. As part of the CDP; AIB maintained leadership status and were awarded CDP Climate Change A- rating in 2019.



AIB is the first Irish company to achieve the Business Working Responsibly (BWR) mark for our global operations. The BWR mark is the only independently audited standard for Sustainability in Ireland and is audited by the NSAI and based on the international standard for Social Responsibility - ISO 26000.



Helen Normoyle,
AIB Non-Executive Director, speaking
at our third Sustainability Conference
during Climate Finance Week 2019

OUR APPROACH TO RESPONSIBLE BUSINESS AND SUSTAINABILITY



➤ For environmental and energy management, AIB is certified to ISO 14001 and ISO 50001. Certification to these international standards is proof of our commitment to minimising our environmental impact.



➤ Over the last number of years we have been working to build a more sustainable business. We have invested in wind energy projects, launched a €5 billion climate action fund and created a green mortgage.



➤ We are a Founding Signatory of the UNEP FI (United Nations Environment Programme – Finance Initiative) Principles for Responsible Banking, committing to strategically align our business with the Sustainable Development Goals and the Paris Agreement on Climate Change, joining a coalition of 185+ banks worldwide that represent more than a third of the global banking industry.



FTSE4Good

➤ AIB Group is a constituent of the FTSE4Good Index Series. The FTSE4Good Index Series is a series of benchmark and traceable indexes for ESG (Environmental, Social and Governance) investors, which was launched in 2001.



➤ AIB have become a supporter of Task Force on Climate-related Financial Disclosures (TCFD). The TCFD recommends voluntary, consistent climate-related financial risk disclosures for use by companies in providing information to investors, lenders, insurers and other stakeholders.

WHAT WE EXPECT OF YOU



WHAT WE EXPECT OF YOU

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

- HUMAN RIGHTS
- HEALTH, SAFETY AND WELFARE
- SUPPLY CHAIN
- DIVERSITY AND INCLUSION
- DOING BUSINESS RESPONSIBLY
- DOING BUSINESS SUSTAINABLY



SPEAK UP

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



COMPLY WITH THIS CODE

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



SHARE THIS CODE

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



LET US KNOW

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

WHAT WE EXPECT OF YOU

HUMAN RIGHTS

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

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

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

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

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



**YOU CAN READ OUR MODERN
SLAVERY STATEMENT HERE**



WHAT WE EXPECT OF YOU

HUMAN RIGHTS

WE EXPECT OUR SUPPLIERS TO:



Respect the human rights of your employees and to comply with all relevant legislation, regulations and directives in the countries and communities in which you operate.



Prohibit forced labour and human trafficking in your supply chain.



Prohibit the use of child labour.



Provide clear and uniformly applied disciplinary and grievance procedures including prohibiting mental, physical or verbal abuse.



Respect the rights of employees to join or refrain from joining worker organisations and will allow workplace access for such organisations to facilitate their representative functions.



Ensure employees' working hours and pay rates comply with national laws and industry standards.



Ensure that employees' total worked hours shall not exceed the maximum allowable under local legislation.



Ensure all employees' overtime is voluntary and compensated in accordance with applicable laws.

WHAT WE EXPECT OF YOU

HEALTH SAFETY AND WELFARE

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

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

WE EXPECT OUR SUPPLIERS TO:

- ✓ Provide a safe work environment abiding by local laws and regulations, respecting the health and wellbeing of your employees, partners, stakeholders, and any subcontractors.
- ✓ Have a documented and compliant Health and Safety Policy.
- ✓ Identify and inform us of any incidents that may affect us, and do so in a timely manner.



WHAT WE EXPECT OF YOU



SUPPLY CHAIN

A sustainable supply chain is essential to our sustainability strategy. We commit to operating responsibly and sustainability within our supply chains ensuring we live by **OUR PLEDGE TO DO MORE.**

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

WHAT WE EXPECT OF YOU

WE EXPECT OUR SUPPLIERS TO:

- 

Treat your suppliers fairly and with respect.
- 

Manage your suppliers appropriately to mitigate supply chain risks through fit for purpose governance.
- 

Ensure adherence to all relevant legislative and regulatory requirements.
- 

Have clear and unbiased payment policies for your own suppliers.
- 

Stay up to date with industry standards and best practices.
- 

Ensure efforts are made towards supply chain optimisation to ensure effectiveness, sustainability, growth, coordination, robustness and responsiveness.
- 

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

WHAT WE EXPECT OF YOU

DIVERSITY AND INCLUSION

Diversity and inclusion are a driving force in our culture at AIB. Embedding diversity across our organisation helps us to be the best that we can be in our thinking, our decisions and our outcomes.

By respecting, developing and harnessing the talents of all our employees, we commit to creating an inclusive and supportive organisation that delivers a superior experience for all our customers, provides an extraordinary place to work for our employees, and brings an appropriate financial return for our shareholders and the economies within which we operate.

AIB works to advance community D&I practices through our involvement in partnerships, industry fora and relevant not-for-profits.

WE EXPECT OUR SUPPLIERS TO:



Treat all employees fairly and not discriminate in hiring, compensation, access to training, promotion, termination or retirement on the grounds of gender, age, sexual orientation, ethnicity, disability, political affiliation, or other individual or cultural attribute.



Provide up to date D&I training to all staff but at a minimum your people leaders.



Drive D&I in your organisation with supporting policies and procedures.



Record and monitor company D&I progress against actions set.



Encourage positive mental health at work, and have a documented mental health and wellbeing strategy.



Where feasible contribute to external diversity by adopting a community focus.



WHAT WE EXPECT OF YOU



WHAT WE EXPECT OF YOU

DOING BUSINESS RESPONSIBLY

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

Our internal Code of Conduct policy states our position on many aspects, such as improper payments, conflicts of interest, fraud, competition, gifts and hospitality, and brand and intellectual property protection.

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

WHAT WE EXPECT OF YOU

DOING BUSINESS RESPONSIBLY

WE EXPECT OUR SUPPLIERS TO:



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



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



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



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



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



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



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



Protect whistle-blowers from any negative repercussions.

WHAT WE EXPECT OF YOU

DOING BUSINESS SUSTAINABLY

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



WHAT WE EXPECT OF YOU

WE EXPECT OUR SUPPLIERS TO:



Undertake all business activities with care for the environment and at a minimum will comply with all applicable environmental laws and regulations.



Adopt a sustainability strategy which sets out how your organisation is working to reduce your environmental impacts and support the transition to a low-carbon economy.



Optimise your use of natural resources and minimise the generation of waste.



Collaborate with us to help reduce our environmental impacts (which include carbon reduction, energy consumption, travel, water consumption and operational waste).



Where applicable, seek to secure raw materials from fully traceable, sustainable sources.



Measure your organisation's environmental impact and put in place plans to reduce these impacts.



Adopt a written Environmental Policy which is appropriate and relevant for your operations.

OUR COMMITMENT TO YOU



OUR COMMITMENT TO YOU



Live by our values and behaviours by being one team, owning the outcome, driving progress, showing respect and eliminating complexity.



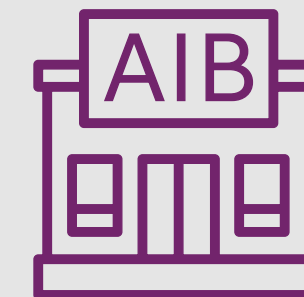
Build strong relationships, ensuring our suppliers understand and deliver to the needs of our customers and our business.



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



Providing clear guidance about our payment procedures.



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

USEFUL LINKS

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



**WHAT DOING BUSINESS RESPONSIBLY
MEANS FOR AIB IS AVAILABLE HERE**

CONTACT US

We value your feedback. The Responsible Supplier Code will be reviewed annually, however, you can share any queries or comments at any time with your Supplier Manager or business contact. Alternatively you can contact us at suppliers@aib.ie