



Group Code of Conduct

Helping you Thrive



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BOI Group Code of Conduct

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Introduction to the Code of Conduct

The Bank of Ireland Group Code of Conduct will help you thrive. It is there to help you understand the importance and expectation we set on our Values in delivering our Purpose and achieving our Strategy.

The Group Code of Conduct:

- will help you understand what we stand for as an organisation
- will highlight that *how* you do your role is an integral part of working at Bank of Ireland and is as important as *what* you deliver
- sets out the expectations we have for how you behave, perform and interact with colleagues, customers and others.

It doesn't capture every specific scenario, but it will guide you to think about how you behave and to ask the right questions. It will show you where to go for help or guidance. We must each follow the principles and spirit of the Code to do the right thing, and we trust each other to do the same.

And so the Code is our commitment, and one that we all sign up to, to act with integrity and honesty, demonstrate good conduct and live our Values every day.

By doing this we will all contribute to making Bank of Ireland a great place to work, with a culture that is world class.



“ *The Group Code of Conduct clearly reflects our Values and core competencies, and the relevant standards and behaviours we should all role model. The Code applies to each colleague at Bank of Ireland Group, setting out our expectations for how we help our customers, colleagues, shareholders and wider society to thrive.* ”

Myles O'Grady, Chief Executive Officer, Bank of Ireland Group



Scope and responsibilities

The Code applies to all colleagues directly employed by any entity in the Bank of Ireland Group (referred throughout as 'BOI' or the 'Group') and Independent Non-Executive Directors, excluding Davy.

The Code for All Colleagues	The Code for People Managers
<ul style="list-style-type: none"> • It is important that we all understand and familiarise ourselves with the Group Code of Conduct. • We all must comply with the Code and the relevant conduct standards, laws and regulations. • We must all complete the Group Code of Conduct Web Based Training each year and all related mandatory training. • We must all understand and comply with any specific conduct requirements if our role is in scope of CBI Fitness and Probity (F&P), the Individual Accountability Framework (IAF) or the Senior Managers and Certification Regime (SMCR). • We must all report wrongdoing when we see it, through appropriate channels potentially including Speak Up. • We must all follow the minimum standards and requirements set out in all Group Policies, processes and procedures. • We achieve and maintain the level of competency, capability and training required for our role. • We are responsible for our individual behaviour and performance. • We build resilience and act responsibly by integrating ESG principles, and respect for human rights into our daily work, helping to protect the environment, support our communities, and contribute to a fairer, more resilient society. 	<p>People Managers have additional responsibilities. They are expected to support and embed the Group Code of Conduct throughout BOI including:</p> <ul style="list-style-type: none"> • Role model the expected Group Code of Conduct behaviours and regularly communicate with their team on the importance of understanding and complying with the Code. • Look after colleagues' wellbeing, drive high performance, and help colleagues thrive. • Help colleagues understand what is expected of them – this includes the standards set out in our Code as well as other key Group policies. • Raise any examples of wrongdoing that are brought to your attention with senior managers where possible, and encourage colleagues to report relevant wrongdoing via Speak Up in the knowledge that this will be taken seriously and that their statutory rights will be respected. • Pro-actively resolve colleague issues, and if appropriate, promptly escalate through appropriate channels. • Lead by example by embedding ESG principles, and human-rights considerations into your team's culture, behaviours, risk assessment and decision-making.



Aligning to our Vision, Purpose and Values

Our culture ambition is to help you thrive and we do this by living our Values - **Customer first, Better together, Take ownership,** and **Be decisive.**



Our Purpose – ‘Helping you Thrive’



Our Purpose defines why we exist and the impact that we want to make. Our Purpose is what we believe in – why we do what we do.

We’ve reflected on our relationship with customers, colleagues and shareholders, and the impact that we make on wider society. Our Purpose reflects all those that we engage with and is used every day in decision making.

Our Purpose and Group culture will be delivered by living our Values, which are fundamental to who we are at our best and how we will succeed: Customer first, Better together, Take ownership and Be decisive.



Aligning to our Vision, Purpose and Values (continued)



Our Vision: Unrivalled financial choice - now and for generations to come

Our Vision sets out where we are going now and where we are looking to go in the long term.

Unrivalled: We will be excellent in everything that we do. This spans across every team, every role, and every division.

Financial choice: We will set the standard in the provision of financial products and services, in every part of our business – retail, corporate, wealth, insurance – wherever we do business. We are unique in our ability to serve our customers at every step and stage of their lives.

Now and for generations to come: We will offer our customers long-term value – for generations – as we have done for more than 240 years.

Bringing our Purpose and Vision to life

We have clear ambitions for each of our stakeholders, to deliver our Purpose and Vision.

Customer: to be number 1 in customer advocacy.

We want every interaction to show that we understand customers' needs, value their trust, and are committed to helping them thrive.

Colleague: to be the best place to work.

We will set the standard for how we support, develop, and value our people – creating an environment where colleagues feel trusted, included, and empowered to do their best work.

Shareholder: to deliver attractive returns for our shareholders.

We will grow our value in a sustainable way: improving performance, managing costs and investing wisely.

Society: to help society address significant challenges.

Our ambition is to support positive societal impact by being Ireland's most trusted sustainable finance partner.

We will help society address significant challenges by partnering with customers and businesses to support the transition to a low carbon and sustainable economy, and supporting housing and infrastructure development.

We will also support societal impact by fostering inclusion and enabling communities to become more financially resilient.



Our Values

In order to realise our Vision and Purpose, we have a shared commitment to our Values. Our Values represent who we are (and who we want to be) at our best.

Our Values guide how we show up every day for each other and how we deliver for our customers. Living our Values makes us better and sets us apart from other organisations.

At Bank of Ireland, our four Values are:



Customer first

Everything we do is for our customers. Our business is designed around them.

We are empathetic, we listen, and we work hard to meet their needs, connecting with them to make them feel valued. Their success is our success.



Better together

We achieve more when we work together.

We collaborate, we share ideas, we challenge thinking, and we learn from and care for one another. We value the real power that lies in our capacity to harness our diverse skills and experiences for the good of the whole.



Take ownership

We are trusted and supported to take ownership for our actions.

We are trusted and supported to deliver the commitments we make to our customers, colleagues and communities. We accept responsibility for our decisions and actions.



Be decisive

We move quickly and make things simple to deliver positive outcomes for customers and for us.

We move quickly, with purpose, to deliver our promises for customers and the Bank. We exercise good judgement, avoid complexity and work smarter together to get to the solution quickly.

We want everyone in the organisation to connect with our Values and to think about how they can help to guide our behaviour and the work we do every day. If we all really live these Values, we will make Bank of Ireland an exceptional organisation.



Good Conduct at Bank of Ireland

As you can see, our Vision, Purpose and Values are all about what we do, why and how. In this context, good conduct is at the heart of working at BOI – it is a cornerstone around which our business is built and is essential for the health of our industry.

Customers expect us all to be capable and competent, but they also expect us to be trustworthy and working with their best interests at heart. The society we're all a part of needs a healthy financial services industry it can rely on and trust, and that starts with each of us doing the right thing.

This Code sets out the minimum standards of conduct that our customers, our clients, our colleagues and our regulators expect of us, regardless of whether we are in regulated roles and regardless of the jurisdiction we operate in.



These standards, which align with our Vision, Purpose and Values, apply to all colleagues equally.

At all times, we should:

- **act honestly, ethically and with integrity**
- **act with due skill, care and diligence**
- **co-operate with BOI's regulators in good faith and without delay**
- **act to deliver good outcomes for our customers and treat them fairly and professionally**
- **observe proper standards of Market Conduct and trading venue rules.**

Many of us hold roles where we need to comply with specific conduct requirements set by an external regulator, in addition to the requirements of the Group Code of Conduct – these requirements are listed in the Appendix. You should complete any required training if this is the case, to ensure you understand your specific responsibilities.

- If you hold a CBI Pre-Approval Controlled Function (PCF) or Controlled function (CF) role, you are expected to understand and comply with your statutory obligations and applicable Conduct Standards.
- If your role falls within the scope of the UK Senior Managers and Certification Regime (SMCR), you are expected to understand and comply with the UK Regulator's Conduct Rules.

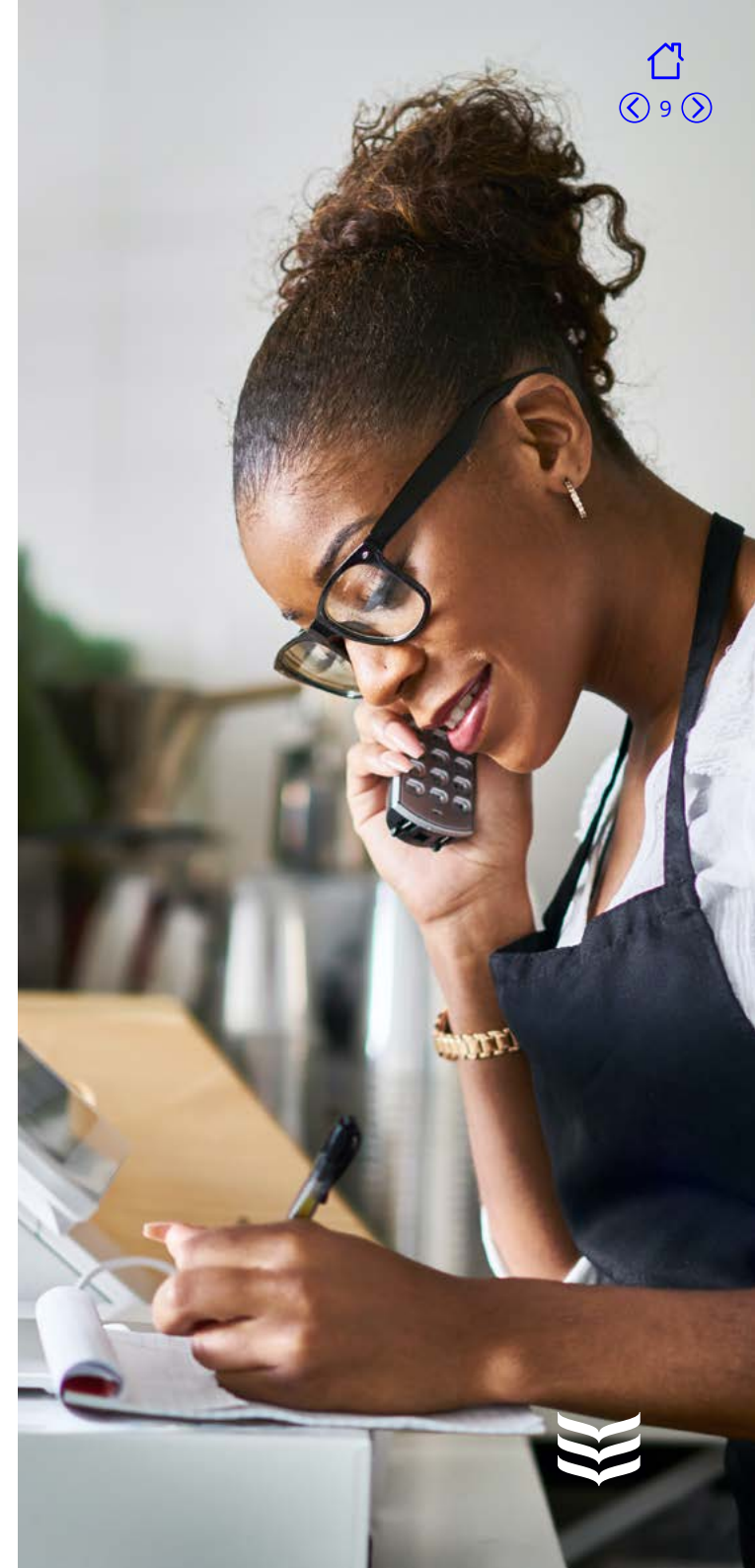


Section 1 - Helping Customers Thrive

This aligns to our key value of Customer first - Everything we do is for our customers. Our business is designed around them. We're empathetic, we listen, and we work hard to meet their needs, connecting with them to make them feel valued. Their success is our success.

Here are our expectations for helping customers to thrive:

- we act in customers' best interests and always try to deliver good outcomes for customers
- we avoid "bank speak" and communicate with our customers clearly, honestly and in plain English, helping them make informed decisions
- we design products and services that are useful, meet customers' needs, with sustainability in mind. We charge for products in a fair and transparent way
- we only provide advice in a professional manner to customers when we have the appropriate knowledge of products and services and have the required qualifications to do so
- we take personal responsibility for putting things right when a mistake is made and say sorry. We work hard to resolve complaints and errors fairly and quickly
- we take action to avoid causing harm to our customers by regularly reviewing the products and services we provide and we make changes where potential harm is identified
- we treat all customers with respect, dignity and fairness at all times.



Helping Customers Thrive (continued)

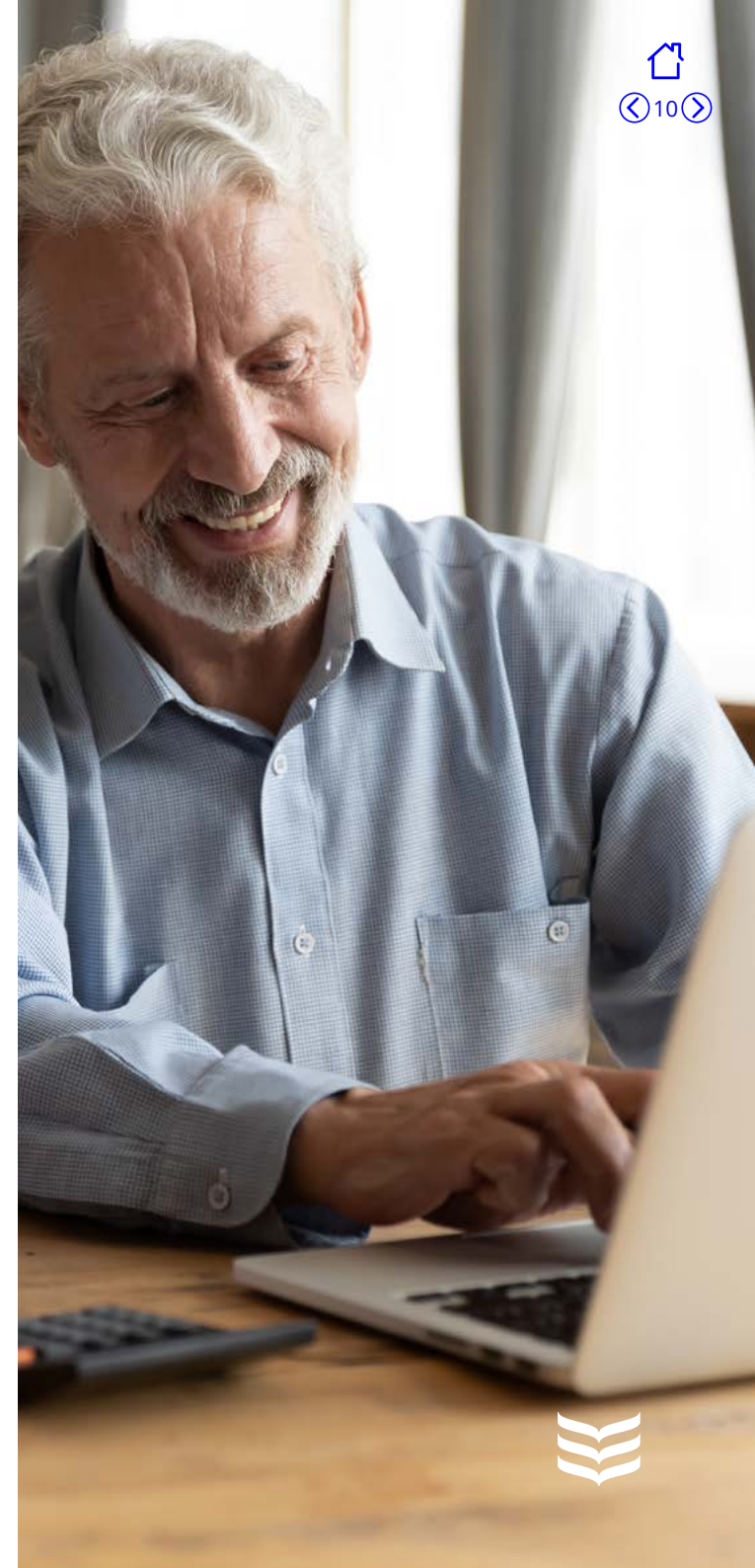
Our [Customers Commitments](#) are standards for how we put the Customer first value into action every day and they show how we're right with customers in the moments that matter, enabling them to make confident financial decisions. For colleagues, they support customer centric decision making at all levels and drive fair outcomes for customers. For customers, they demonstrate our transparency around our ambition – and our willingness to be held to account.

The Customer Commitments are published on our Group website. All colleagues are expected to support the delivery of the Customer Commitments regardless of role or jurisdiction.

Financial Inclusion and Support (formerly Vulnerable Customers)

Supporting customers who need extra help or who have experienced a recent life event is an important part of the Group Code of Conduct. Financial Inclusion and Support is a core pillar within our Financial Wellbeing strategy, and is about ensuring that everyone has access to financial services, and the support they need to use our products and services.

To reflect our commitment to these customers, annual "Financial Inclusion and Support" training for all colleagues is a mandatory part of our learning curriculum.



Section 2 - Helping Colleagues Thrive

We want to make BOI a great place to work for everyone so that all colleagues can thrive. We do this by living our Values. Our Values guide our decisions and actions. We respect and trust each other to deliver good outcomes. We recognise each other's contributions and take pride in doing the right thing.

Here are our expectations for helping colleagues to thrive:

- we treat each other with respect, dignity and fairness at all times – and we hold each other accountable for this
- we are all responsible for creating a safe and secure environment for colleagues to be themselves. We speak up for what is right even where we feel this is a difficult thing to do
- we always express ourselves in a professional and respectful manner. We never disrespect our customers, colleagues or other third parties through any medium, including via digital platforms (such as social media, messaging apps or chats)
- we follow all reasonable management instructions
- we operate in line with Group policies and procedures, including the Expenses Policy
- we value inclusion and diversity and stand against all forms of discrimination
- we each conduct our personal financial affairs responsibly and seek help if we find ourselves in financial difficulty at any time
- we are committed to developing and maintaining our professional knowledge and skills to ensure we remain capable and competent in our role.



Helping Colleagues Thrive (continued)

Respect at work

We aim to promote a culture that is diverse and inclusive, which respects and Values contributions from colleagues of diverse backgrounds, and where everyone is welcome and can be themselves.

- BOI will not tolerate any form of discrimination based on protected characteristics including race, religion or belief, disability, gender/ gender reassignment, sexual orientation, marriage/civil partnership, age or any other characteristic protected by local laws or customs that are intimidating, hostile or offensive to, or unwanted by, any other person.
- We do not tolerate discrimination, bullying or harassment of colleagues, customers, contractors or anyone working or visiting our buildings or in any interaction.
- We will treat allegations of discrimination, bullying or harassment as serious matters and will seek to address them promptly and confidentially where possible.

Our purpose is to help you to Thrive.

At the heart of this purpose is our commitment to [Inclusion and Diversity](#): to foster an inclusive working environment, that is welcoming to all, where all colleagues are enabled to reach their full potential and to attract, promote and retain diverse talent at all levels.

The core pillars of Inclusion & Diversity in BOI are:

- become a diverse bank (to reflect the customers and society we serve)
- be the most inclusive Irish listed public limited company
- foster communities that create belonging.

We are proud of our seven colleague networks: Intergenerational, Multicultural, Family Network, Gender Balance, Accessibility, Neuroinclusion and With Pride.



Helping Colleagues Thrive (continued)



Supporting colleagues

As an organisation we are committed to supporting colleagues in all aspects of their role and throughout their careers, including:

- the [wellbeing](#) of our colleagues and their families - we promote healthy, sustainable and balanced lives by supporting wellbeing needs under the key pillars of mental, physical, financial and social wellbeing. We offer a range of supports to colleagues including our App/Web Portal, and our Employee Assistance Programme, Here For You 24/7
- our performance development approach - [Thrive](#) - achieves company priorities through focusing on colleagues' personal growth, development and wellbeing. We believe that colleague growth and organisational strategy are part of the same ambition.



Section 3 - Helping Society Thrive

Bank of Ireland plays an important role in supporting society. We do this by lending responsibly, protecting our customers, and supporting sustainable growth. [Sustainability](#) is a core part of our strategy under the “Resilient Company” pillar.

Here are our expectations for helping society to thrive:

- we support an inclusive, diverse, and digitally capable workplace
- we use sustainability knowledge to make good everyday decisions and act as ambassadors of positive change
- we help improve financial wellbeing for customers and communities
- we consider environmental and sustainability impacts in all our work
- we support the transition to a net zero economy by 2050, in line with the Irish and UK government actions and the goals of the Paris Agreement
- we identify and raise sustainability risks, including climate, environmental harm and human rights risks
- Act transparently and responsibly, with strong [financial crime prevention](#) practices (including anti-money laundering).

Human Rights

We are committed to respecting [human rights](#) in all our activities. Every colleague is responsible for upholding this commitment.

We will:

- ensure our activities do not infringe upon the human rights of our colleagues, customers, suppliers and communities
- not support or finance any human rights abuses, including modern slavery and human trafficking
- act quickly to address and resolve any concerns.



Keeping Bank of Ireland safe

Regulations

We provide 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
- act honestly, fairly and reasonably in our dealings with customers, colleagues, shareholders and wider society.



By keeping to the letter and intention of the law and regulations, we aim to gain and maintain 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 Bank of Ireland Group
- meet the requirements of all regulators
- avoid the cost of 'having to put things right'
- protect our business.

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 people manager or a senior manager
- raise the matter through Group Compliance
- raise the matter independently of management, as set out in the [Speak Up policy](#).

If you witness any activity that does not meet our legal or regulatory obligations, or you have suspicions of criminal activity, and you do not report the matter, you may be accused of being involved in the activity and have to face the consequences, up to and including prosecution. Every colleague has a role to play in protecting our reputation.



Keeping Bank of Ireland safe (continued)



Bribery and corruption

Bribery and corruption are unacceptable. The Group maintains a zero-tolerance policy towards bribery and corruption practices. Colleagues are prohibited from offering, providing, requesting or receiving anything of value to or from any person or entity for the purpose of improperly obtaining or retaining or securing an advantage; and/or inducing the recipient to perform his/her role in breach of an expectation of good faith, impartiality or trust. We are particularly sensitive to these risks when engaging with Public Officials.

We will not engage in any business activities where bribery or corruption is required to secure a contract. Please see the Bribery & Corruption Risk section of the [Group Financial Crime Risk Policy Part 3: Fraud and Bribery](#) for further guidance.

Notification of issues (criminal matters, financial issues)

We help customers and clients manage their money, and as such we are all expected to notify BOI management of anything that might impact on the trust our customers have in us. We recognise that people's circumstances change and we want you to speak with us where there are situations which may impact on your ability to perform your role. There are supports on offer for colleagues and we want to help you navigate any difficult circumstances you may be going through.

You can reach the Colleague Financial Care Support team on colleaguefinancialcare@boi.com.

Circumstances where you should inform your People Manager and any internal representative include:

- police arrest or caution
- conviction, judgements or court orders for a criminal offence
- any adverse judgements / proceedings relating to your personal finances
- any actual or threatened litigation or regulatory proceedings against you or any businesses which you control, that may impact your reputation
- changes in legal right-to-work status
- any potential conflict of interest or outside business interest (see [Group Market Integrity Policy](#) and [Group Financial Crime Policy](#))
- any personal relationships at work, which might give rise to a conflict of interest or pose a risk to the Bank
- personal changes that may make you a politically exposed person.



Keeping Bank of Ireland safe (continued)

Conflicts of interest

Conflict of Interest is defined as “a situation in which the Group, or part of the Group, or any of its colleagues, has a business or personal interest which is actually, potentially or may be perceived to be incompatible with or compete with such an interest of any one or more customer, BOI or a part of BOI of business unit.”

Colleagues must ensure that private or personal interests (for example, directorships of other companies and relationships with customers, roles in external organisations (paid and unpaid) including charities do not interfere with the interests of Bank of Ireland Group or our customers. Colleagues must declare all potential conflicts of interest to line management for approval, in line with the Group Market Integrity Policy.

All conflicts should be logged using MyComplianceOffice (MCO). Please see the conflicts of interest section of the [Market Integrity Risk Policy](#) for further guidance.

All colleagues identified as Designated Persons (Persons working in sensitive areas of the Group) are notified in advance of the requirement to submit personal trade pre-clearance requests as per the Group Personal Account Dealing Rules. Pre-clearance requirements relate to personal investments in publicly listed companies only.

Information Security

We treat all information as confidential and do not release information about any of the Group’s activities, customers or colleagues to people outside the Group, including the media, or to a colleague’s personal email without permission.

We should all manage our data in line with all relevant [Group policies and standards](#) and follow any policies in relation to data requests where information is requested, including from one of our regulators.

Raising a concern

There are two types of concern a colleague may wish to raise:

- a grievance which typically relates to more personal matters and your treatment within the workplace
- a Speak Up concern which is defined as any suspected relevant wrongdoing (as defined within the ROI Protected Disclosures Acts 2014 and 2022 and UK Employment Rights Act 1996) and failure to comply with EU, UK and US regulations, including breaches of banking regulations and/or failure to comply with Group Policies under the Group’s Risk Management Framework.

Grievances

A grievance arises when a colleague wants to raise a concern, problem or complaint in relation to their employment. A colleague grievance might relate to terms and conditions of employment, working environment, organisational change, etc.

We know that many employment-related issues are best resolved quickly and at the point closest to where they originally arose. Therefore our approach to colleague grievances includes empowering colleagues to speak about the issue with management in the first instance, in order to attempt a local and informal resolution. Further details can be found in our [Grievance Policy](#).



Keeping Bank of Ireland safe (continued)

Speak Up

We are committed to conducting our business with honesty and integrity, in a transparent, accountable and ethical manner, in line with our regulatory, legal and Group Policy obligations. We expect all colleagues to maintain these same high standards, thereby protecting our customers and safeguarding the Bank's strong reputation within our community.

A Speak Up concern is:

- any suspected relevant wrongdoing (as defined within the ROI Protected Disclosures Acts 2014 and 2022 and UK Employment Rights Act 1996) including failure to comply with EU, UK and US regulations and breaches of banking regulations
- failure to comply with Group Policies under the Group's Risk Management Framework
- UK colleagues only: behaviour that harms or is likely to harm the reputation or financial wellbeing of the Group, its subsidiaries or branches.

It is critical that the Group know about any suspected or actual wrongdoing that could negatively impact on its customers, business or strategic priorities. We all therefore share responsibility to raise concerns where these arise. Further information on the Speak Up process is stored on our [Group Speak Up Hub](#) or on our [Speak Up Portal](#).



Do you have information relating to a "Speak Up Concern"?

"I think an offence may have been committed."

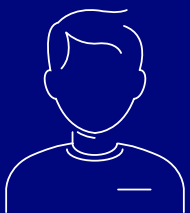
"I suspect this may be internal fraud."

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

"Another colleague has inappropriately shared their user access password."

"I think this may be a related party transaction."

"I think a Risk Management Framework Policy was breached"



Then Speak Up! Speak Up Internally

Our **Speak Up Portal** is a confidential and secure web-based system managed by the Group Speak Up Desk.

Or

Authorised Recipient

- ✉ Michelle.McGreal@boi.com
- ✉ AlisonA.Campbell@boi.com*
- ✉ Amitav.Borkakoty@boi.com (UK)
- ✉ Noreen.Ocallaghan@boi.com (US Branch)

*Authorised Recipient for ROI, UK, NIAC & EU Branches

Speak Up Voicemail Numbers

- ☎ ROI: 1 800 800 590 (Freephone)
- ☎ UK: 0044 800 022 3970 (Freephone)
- ☎ US: 001 (833) 824 9451 (Freephone)
- ☎ Other jurisdictions: +353 (1) 1 612 2200 (Paid)

Or

BOI Group Speak Up & Policy Sponsor

- ✉ Niamh.marshall1@boi.com

Then Speak Up! Speak Up Externally

While we hope you feel comfortable raising your matter internally, should you consider it necessary to raise the matter externally, you may in certain circumstances do so via the following external reporting channels:

Protect (UK)

- ☎ UK: + 44 203 117 2520
- ✉ whistle@protect-advice.org.uk (Advisory Service Only)

Financial Conduct Authority (UK)

- ☎ +44 020 7066 9200
- ✉ whistle@fca.org.uk

Prudential Regulation Authority (UK)

- ☎ +44 (0) 203 461 8703
- ✉ whistleblowing@bankofengland.co.uk

SEC (US)

- ☎ telephone: 202-551-4790
- 🌐 www.sec.gov/whistleblower

Central Bank of Ireland (CBI)

- ☎ 1800 130014
- ✉ confidential@centralbank.ie

Office of the Protected Disclosures Commissioner

- ☎ +353 (0) 1 639 5650
- ✉ info@opdc.ie
- 🌐 www.opdc.ie

Prescribed Bodies or Persons

Full List of Prescribed Bodies and Persons under the Protected Disclosures Act 2014 (as amended) - [here](#)

Transparency International Ireland (All colleagues)

- ☎ 1800 844 866
- ✉ helpline@transparency.ie
- 🌐 www.transparency.ie

European Central Bank whose whistleblowing portal can be found [here](#)

Grievances, Respect at Work Matters, and other concerns

Grievances and Respect at Work Matters are not Speak Up Concerns under this Policy (see below). Such concerns should be raised under the Group's Grievance Policy and Respect at Work Policy to ensure these can be appropriately addressed under the correct policy.

HR Grievances:

- Your HR Business Partner or
- ✉ employeerelations@boi.com

Respect at Work Matters

- ✉ employeerelations@boi.com



Breaches of the Code

At BOI, we are committed to creating an environment where all colleagues are informed of the conduct and behaviours expected, and fully trained and supported to perform effectively in their role. Sometimes, despite adequate training and support having been provided, a colleague may behave in a manner contrary to the Group Code of Conduct, our Values, policies or practices, their statutory obligations, or their legal and regulatory requirements, and so it may become necessary to start a formal process to stop unacceptable behaviours.

All colleagues should be able to work free from behaviours which are contrary to our Purpose and Values. The [Disciplinary Policy & Procedures](#)

exist to address those unwanted behaviours, with an aim of maintaining an environment where colleagues can thrive.

Where colleagues breach the Group Code of Conduct they may face personal consequences, such as internal disciplinary action (up to and including dismissal) and / or external regulatory or criminal consequences such as fines or sanctions, exclusion from taking certain regulated roles or, in very serious cases, a prison sentence. Circumstances may arise where the Group determines that external reporting is required to the Group's regulators or law enforcement authorities.



Find out more

Our Code is integral to bringing our Purpose and Values to life. It sets our expectations of colleagues for how they help customers, colleagues, shareholders and wider society to thrive.

However it is also underpinned by a number of key policies and related reading that helps guide colleagues every day.

You will find all the support you need on Insite, including under the People tab and Employee Centre (which includes the Group's [People Policies and colleague support](#)), the [Risk Hub](#) (which includes Group Risk Policies) or the [Policies and Guidance](#) tab, which allows you to search for anything on Insite.

Approved by:	Bank of Ireland Group Board
Review Frequency:	Annually
Last Approved:	April 2026
Policy Title:	Code of Conduct 2026
Policy Owner:	Chief People Officer



Appendix One - Conduct Standards and Conduct Rules

The Central Bank of Ireland (CBI) Common Conduct Standards (applicable to all CF and PCF holders in the Group) are as follows:

Acting with honesty and integrity	Acting with due skill, care and diligence	Operating in good faith and without delay with regulators	Acting in the best interests of customers and treating them fairly and professionally	Operating in compliance with standards of market conduct and trading venue rules
<ul style="list-style-type: none"> • having regard to the legitimate interests of the Group, its staff, customers and other persons with whom it engages • operating without bias and preventing or identifying and appropriately managing, conflicts of interest • not exerting pressure or influence on a customer so as to limit his or her ability to make an informed choice in relation to any financial service • not misusing or misappropriating any assets or information of the Group or its customers • reporting appropriately, and not impeding others from reporting, to the management of the Group, information relevant to, or giving rise to a suspicion of, the commission of a prescribed contravention or contravention of any other legal obligation or standard imposed on the Group, and any matter otherwise adversely affecting the activities or interests of customers, the Group, its related undertakings, or the financial system in the State. 	<ul style="list-style-type: none"> • having appropriate knowledge of the business activities of the Group relevant to the controlled function, and the associated risks of those activities • having appropriate knowledge of the legal and regulatory framework, including any legal obligation or standard imposed on the Group, relevant to the controlled function • operating in compliance with the systems and controls, processes, policies and procedures of the Group and any legal obligation or standard imposed on the Group • acting without detriment to customers, the Group, its related undertakings, or the financial system in the State • ensuring that any communication, including any record, provided to a customer or other person, is clear, accurate, up to date and not misleading • acting appropriately in any decision-making, including collective decision-making, ensuring decisions are properly informed and exercising sound judgement • monitoring the performance of any delegated tasks and ensuring that those tasks are appropriately performed. 	<ul style="list-style-type: none"> • responding to requests and requirements under financial services legislation in an open and timely manner • disclosing information or records when required to do so under financial services legislation • attending meetings and interviews when required to do so under financial services legislation • not providing false, inaccurate or misleading information, records or explanations • not destroying, hiding or putting beyond reach information or records that it is reasonable for the person to expect to be required to be disclosed under financial services legislation • not engaging in evasive, misleading or obstructive conduct. 	<ul style="list-style-type: none"> • ensuring that customers are informed in a clear manner of relevant information relating to financial services of which they ought to be aware, and not impeding the provision of relevant information to customers • communicating with customers in a timely manner having regard to the urgency of any matter and the time required by the customer to consider the relevant information • assessing the needs and circumstances of customers, including their level of knowledge and experience of financial services, their financial circumstances and the range of options available to them, and ensuring that any advice or recommendation provided to customers is appropriate and tailored to their needs and circumstances • ensuring that customers are not misled as to the advantages of any financial service • acknowledging and seeking to resolve any complaints received from customers • resolving errors or mistakes affecting customers, and disclosing errors or mistakes to the customers affected in a timely manner • not acting in a manner that is unfair to customers. 	<ul style="list-style-type: none"> • This standard requires that CF and PCF role holders operate in compliance with standards of market conduct and trading venue rules to which the Group is subject by law and any market codes that apply to the Group's affairs.



Appendix One - Conduct Standards and Conduct Rules (continued)

The CBI Additional Conduct Standards (applicable to all CF1 and PCF holders in the Group) are as follows:

- that the business of the Group is controlled effectively
- that the business of the Group is conducted in accordance with its obligations under financial services legislation
- that any delegated tasks are assigned to an appropriate person with effective oversight and
- that any information of which the CBI would reasonably expect notice in respect of the business of the Group is disclosed promptly and appropriately to the CBI, including information relevant to, or giving rise to a suspicion or expectation of, any of the following:
 - i. commission of an offence by the Group or a person performing a controlled function in relation to it
 - ii. commission of a prescribed contravention or any other breach of obligations under financial services legislation by the Group or a person performing a controlled function in relation to it
 - iii. concealment or deliberate destruction of evidence relating to a matter referred to in subparagraph (i) or (ii)
 - iv. provision of false or misleading information to the CBI relating to a matter referred to in subparagraph (i) or (ii)
 - v. obstruction or impeding of an investigation relating to a matter referred to in subparagraph (i) or (ii)
 - vi. commencement of legal proceedings by or against the Group arising from its obligations under financial services legislation
 - vii. commencement of legal proceedings against the Group which may impact on its ability to continue to trade
 - viii. anything that may otherwise interfere significantly with the operation of the Group or its compliance with its obligations under financial services legislation
 - ix. a decision by the Group to cease to provide financial services of a particular description.

Colleagues who are subject to the above Conduct Standards have a legal obligation to take any steps that are reasonable in the circumstances for them to take to ensure that the Conduct Standards are met. Guidance on reasonable steps to comply with the Common Conduct Standards and Additional [Conduct Standards can be found on Insite](#).

UK Prudential Regulation Authority (PRA) and Financial Conduct Authority (FCA) Individual Conduct Rules

The PRA and FCA Individual Conduct Rules that apply to all in-scope colleagues are as follows:

UK Individual Conduct Rules

You must act with integrity.

You must act with due skill, care, and diligence.

You must be open and cooperative with the Financial Conduct Authority (FCA), the Prudential Regulation Authority (PRA), and other regulators.

You must pay due regard to the interests of customers and treat them fairly.

You must observe proper standards of market conduct.

You must act to deliver good outcomes for retail customers.

For colleagues in Senior Manager Function (SMF) roles, the PRA and FCA have laid out additional Senior Manager Conduct Rules. Details of both the Individual Conduct Rules and the additional Senior Manager rules, including the reasonable steps you should take to remain compliant with them, can be found on [Insite](#)



Appendix Two - Code of Conduct Check

Code of Conduct Check

Helping you 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 we are customer first, and that we are working better together, taking ownership, and being decisive in our decisions and actions.



Am I putting my customer first?



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?



Is the decision in compliance with all legal and regulatory requirements applicable in my jurisdiction?



Do I have a capability gap in this subject matter?



Have I taken sustainability and the environment into consideration?

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





Right with you