



Bank of Ireland Group

Code of Supplier Responsibility

November 2025



**Bank of
Ireland**

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1. Foreword

I am pleased to endorse the updated Bank of Ireland Group Code of Supplier Responsibility.

At Bank of Ireland Group (“the Group”), our purpose is to help our customers, colleagues, shareholders, and communities thrive. Our strategy focuses on building stronger relationships, simplifying our business, and embedding sustainability at our core. We are guided by our values of customer first, better together, taking ownership and decisiveness.

We are committed to upholding the highest ethical standards in our business activities. Key to this is ensuring we work with suppliers that share our purpose and values and ensuring that all our suppliers that provide goods or services to or on behalf of the Group operate in an ethical, sustainable, inclusive, and accessible manner, including relating to working conditions, equal treatment and opportunities for all and other work-related rights.

The Group Code of Supplier Responsibility (“the Code”) sets out the key social, ethical and sustainability standards we expect from our suppliers, aligned with our Sustainability Strategy, Group Code of Conduct and Group Third Party Policies. The Code highlights our key priorities, including ensuring we foster a diverse and inclusive supply chain through to ensuring individuals across our supply base work in a manner which is both safe and healthy. We are committed to managing our impact on the environment and to taking necessary steps to source goods and services responsibly across our supply chain.

Please share this Code with your employees that work on Bank of Ireland Group activity so they can understand our values and aspirations. Together we can achieve positive economic, environmental, social, and sustainable outcomes for our mutual success and the customers and communities we serve.

Ciarán Coyle

Group Chief Operating Officer

Bank of Ireland Group

2. Purpose and Scope

The Group Code of Supplier Responsibility applies to all suppliers to the Group. We define a supplier as any third-party organisation that provides goods or services to or on behalf of the Group. This includes suppliers' officers, employees and subcontractors. This definition does not include individual contractors, agents, or intermediaries.

The Code defines what we expect from our suppliers in terms of responsible business practice and behaviour and aligns with the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. It applies together with [Group Third Party Policies](#) and supplements our membership of the Financial Supplier Qualification System (FSQS), the on-line portal for suppliers to submit policy, control and compliance information relating to your organisation. The Code and Group Third-Party Policies are maintained by our first line Third Party Risk Management team in conjunction with relevant Group Stakeholders.

Suppliers are expected to confirm compliance with this Code, which is in addition to obligations in your supplier agreement(s) with the Group, to comply with applicable laws, regulatory requirements, and applicable Group policies.

You can access our Third-Party Policies, and read more about FSQS and our disclosures and position statements on environmental, social and governance matters on the [Reports and Policies](#) section of the Group website.

3. Our Organisation and Strategy

Bank of Ireland Group ("the Group") is one of the largest financial services companies in Ireland providing a broad range of banking and other financial services to retail and business customers in Ireland, the United Kingdom and select international markets.

We currently transact with approximately 1,800 suppliers predominantly in Ireland and the United Kingdom. Suppliers are categorised according to the nature, scale, and criticality of services they provide to the Group.

Our Group Strategy builds on our 240-year business heritage and is guided by our purpose, which is to help customers, colleagues, shareholders, and society to thrive. Our three strategic pillars are:

- [Stronger relationships](#) –to establish deeper, mutually value-adding customer relationships and easier, joined-up services and products;
- [Simpler business](#) –to simplify the day-to-day activities and interactions of our customers and colleagues;
- [Sustainable company](#) – to deliver impact on the most critical challenges facing our customers, colleagues, and society.

You can find out more about Bank of Ireland Group's trading divisions in all jurisdictions, and a full list of its products and services at [Bank of Ireland Begin](#).

4. Our approach to sustainability

Conducting our business in a responsible and sustainable way is fundamental to achieving our purpose of enabling our customers, colleagues, shareholders, and communities to thrive. We expect our suppliers to share our purpose and values, be accountable, and to act with integrity in an ethical, sustainable, inclusive, and accessible manner in all their dealings.

Our Investing in Tomorrow Sustainability Strategy is embedded in the Group's Sustainable Company strategic pillar which covers:

- **Supporting the green transition** - We are committed to working with our customers, colleagues, and communities to support their transition to a resilient, net zero economy by 2050 in line with government ambitions and actions.
- **Enhancing financial wellbeing** - We are committed to empowering people with the knowledge and skills needed to make the most of their finances while striving to leave no one behind on the journey to financial health.
- **Enabling our colleagues to thrive** - We are committed to creating an inclusive and supportive workplace for all our colleagues, enabling them to develop brilliant careers, supporting them during key life moments that matter and providing a safe and fair place to work that welcomes everybody.

Sustainability Strategy pillars are underpinned by strong foundational topics which guide our commitment to being a sustainable business. These topics include Health & Safety, Sourcing Responsibly, Human Rights, Business Ethics and Culture, Community Investment, Cyber Security, Data and Financial Crime Protection.

5. Our Code of Conduct and Policies

Key Group codes and policies are available on the [Reports and Policies](#) section of the Group website

Group Code of Conduct

The Group Code of Conduct sets out the minimum standards of conduct that our customers, our clients, 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 Purpose and Values, apply to all colleagues equally. The Code stipulates that we should at all times:

- act honestly, ethically, with integrity, 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.

Group Human Rights Policy

The Group Human Rights Policy details our commitment to upholding and promoting Human Rights in all areas of our operations in accordance with the highest international standards, including the United Nations (UN) Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, OECD guides for Multinational Enterprises, Corporate Sustainability Reporting Directive and, International Labor Organisations Declaration on Fundamental Principles and Rights at Work.

This policy also aligns with our commitments under the UN Principles for Responsible Banking, Principles for Responsible Investment and Principles for Responsible Banking.

Group Financial Crime Compliance Statement

This compliance statement sets out our commitment to protect the integrity of the financial system in which the Group, our customers and communities, and wider society operate.

Group Speak Up Policy

The Bank is committed to conducting our business with honesty and integrity and we expect everyone working on behalf of the Bank to maintain these high standards. The Group Speak Up Policy explains what a Speak Up concern is and makes it easier for colleagues, including suppliers, to safely and confidentially raise a Speak Up concern about suspected or actual wrongdoing in a work-related context, without fear of penalisation.

Group Third Party Policies

Group Third-Party Policies summarise internal Group Policy statements into mandatory requirements we expect our Third-Party Suppliers to meet, and reflect our commitment to regulatory compliance, operational resilience, operational excellence, and our shared success.

6. What we expect of you

We expect our suppliers to conduct business with honesty and integrity. Our expectations of suppliers are grouped into five key areas:

- Human Rights & Modern Slavery
- Health and Safety
- Accessibility, Inclusion and Diversity
- Sustainability
- Supply Chain

In addition, as a supplier to the Group **we expect you to:**

- Confirm your agreement to comply with this Code and [Group Third Party Policies](#) (and any future revisions) when you complete our Financial Services Qualification System (FSQS) process and inform us of any changes that may impact your ability to comply with the Code.
- Share this Code and explain its principles to your officers, employees, and sub-contractors that support Bank of Ireland services or work on our projects.
- Ensure fair and honest business dealings with all your stakeholders, including officers, employees, sub- contractors and other third parties.
- Understand the ethical, sustainability, accessibility, and inclusivity practices of your supply chain and proactively work with your suppliers who represent the highest risk on such issues to drive effective risk management.
- Engage with Bank of Ireland on any supplier data requirements stemming from new regulatory and voluntary disclosures requirements.
- Speak up if you are concerned about any actions or decisions that contravene the standards set out in the Code.
- Have your own Code of Conduct or Business Responsibility, or a similar policy or statement that covers adherence to local laws; bribery and corruption; and business integrity (including improper payments, conflicts of interest, fraud, competition, gifts and hospitality, and brand and intellectual property protection).

In each case, we describe our minimum expectations using the term '**we expect.**' In some areas, we aspire to meet certain standards, and in these cases, we use the term '**we encourage.**'

Your supplier contract(s) or agreement(s) with the Group may set out more explicit requirements in these areas which you are required to comply with in addition to the expectations in this Code.

6.1. Human Rights and Modern Slavery

The Group is committed to protecting human rights in all areas of our operations and expect our suppliers to have appropriate controls to mitigate human rights and modern slavery risks in your business and supply chain.

The [Group Modern Slavery & Human Trafficking Statement](#) is available on the [Reports and Policies](#) section of the Group website.

We expect you 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 including compliance with the UK Modern Slavery Act, where applicable.
- Prohibit child labour, forced labour (slavery) and human trafficking in your supply chain and give all employees the right and ability to leave employment with you if they choose.
- Ensure that wages meet legally required minimum standards without unauthorised deductions.
- Allow your employees to legally organise and join associations (such as labour unions).
- Provide uniformly applied expectation of behaviour of all employees, to protect dignity and respect in the workplace.
- Treat all employees and workers fairly ensuring not to harass or discriminate based on gender, gender identity, race, age, sexual orientation, religion, disability, or family situation.
- Provide clear and uniformly applied disciplinary and grievance procedures including prohibiting mental, physical, or verbal abuse.
- Ensure working hours are in accordance with local regulation and industry practice and voluntary overtime is at a manageable level.
- Ensure there are no negative consequences resulting from employees speaking up about a workplace concern.
- Ensure ethical, transparent, and sustainable use of Artificial Intelligence (AI) that does not impact negatively on human rights.

6.2. Health and Safety

We expect all our suppliers to operate in a manner which is safe and secure.

We expect you to:

- Identify hazards and document risk assessments for all your work activities/properties and revise these risk assessments at least annually or sooner where work practices change.
- Have in your employment a competent Health and Safety Advisor or have access to same on a consultancy basis.
- Provide a safe work environment abiding by local laws and regulations, respecting the health and wellbeing of your employees and any subcontractors.
- Have a written Health and Safety Policy and/or Safety Statement.
- Effectively communicate risk assessments and your Health and Safety Policy/ Safety Statement to your staff and provide any additional training as identified by your risk assessment process.

We encourage you to:

- be certified (or working towards certification) to ISO 45001, the internationally recognised Occupational Health and Safety Management Standard.

6.3. Accessibility, Inclusion and Diversity

We expect all our suppliers to support accessibility, inclusion, and diversity.

We expect you to:

- Treat all employees fairly and not discriminate against any group in your employment practices.
- Proactively foster an inclusive working environment that promotes accessibility, gender equality and dignity at work, and the development of a diverse workforce at all levels of the organisation, including diversity of gender, age, disability, sexual orientation, ethnicity, and nationality.
- Adhere to relevant legislation, standards, guidance, and regulations related to Accessibility, including but not limited to Disability Act 2005 (Ireland), Equality Act 2010 (UK) and the European Accessibility Act 2019 (effective 28th June 2025).

We encourage you to:

- Have a documented Inclusion and Diversity Policy or Statement and have governance in place to oversee the implementation of your Policy.
- Provide inclusion and diversity training within your organisation.
- Promote wellbeing initiatives in the workplace.
- Be accredited (or work towards accreditation) as a disability-smart organisation.
- Embrace neuro-divergency as a step towards creating an innovative and inclusive organisation.

6.4. Sustainability

We expect our suppliers to act with integrity and with care for the environment in all business activities.

We **expect** you to:

- Adopt a written Environmental Sustainability Strategy or policy or statement that is appropriate for and relevant to your operations, and which outlines how your organisation is working to reduce environmental impacts and support the transition to a low-carbon and nature-positive economy.
- Conduct all business activities with care for the environment, in full compliance with applicable environmental laws, regulations, relevant legislation, regulatory directives, and codes of practice related to energy management, climate-related disclosures, and transition plans (where applicable).
- Embed climate change and nature-positive principles within your organisation's strategy so that related risks and opportunities are appropriately managed.
- Identify, measure, and proactively manage your organisation's environmental impact—including greenhouse gas emissions, energy consumption, air and water pollution, water usage, waste, and impacts on nature and biodiversity—and implement mitigation plans following the hierarchy of avoidance, minimisation, restoration, and offsetting.
- Collaborate with the Group where requested, to reduce combined environmental impact, and support Group efforts to assess supplier ESG performance data.

We **encourage** you to:

- Be certified (or work towards certification) to a formal Environmental and Energy Management System Standards, such as ISO 14001 and ISO 50001.
- Have a clear commitment to reach net zero emissions by 2050 (or sooner) and be working towards having interim science-aligned greenhouse gas emissions reduction targets by 2030 (or sooner).
- Work towards disclosing scope 1, 2 and 3 greenhouse gas emissions, along with broader sustainability performance.
- Understand and mitigate both the physical and transition risks that climate change poses to your business.
- Adopt circular economy, biodiversity and pollinator-friendly principles in your operations and progressively integrate these principles into your business model.
- Participate in Group education and enablement programme for suppliers such as the Group Sustainable Business Coach online digital tool designed to support SME business customers with sustainability planning and to identify their ESG priorities.

6.5. Supply Chain

We expect all our suppliers to manage their own suppliers in a responsible and sustainable manner.

We **expect** you to:

- Comply with this Code and [Group Third-Party Policies](#)
- Have your own Third-Party Policies and Third-Party Code of Conduct that your suppliers are required to comply with.
- Manage your own suppliers appropriately to mitigate supply chain risks, and to ensure that they are aware of, and comply with this Code.
- Ensure your suppliers' adherence with all relevant legislation, industry standards and best practice.
- Have reasonable payment policies covering your own suppliers aligned to BOI commitment on prompt payment of invoices.
- Consider the ethical, accessibility, inclusivity, and sustainability-related practices of your supply chain and proactively work with suppliers who represent the highest risk on such issues to drive effective risk management.

We **encourage** you to:

- Strive to have a supply base that is inclusive and diverse (including for example supporting Small and Medium Enterprises, Social Enterprises as well as under-represented groups).

7. Compliance with this Code

We expect all our suppliers to meet or exceed all the provisions of this Code and monitor supplier compliance with the Code as part of our internal third-party risk management activities. Our goal is to work with you on developing our approach to responsible sourcing.

In situations where you are not yet compliant with the expectations set out in this Code, you must let us know. We will work with you on the development of an improvement plan.

However, if the issue is serious enough or cannot be resolved in a reasonable time frame, we may undertake a review of the terms of your supplier contract with Bank of Ireland. This may include order reduction or, ultimately, in accordance with any applicable contractual right(s), termination of your supplier contract with Bank of Ireland.

Financial Supplier Qualification System will request evidence covering these topics, and you should provide as much information as possible where requested. We reserve the right to review and/or audit your policies, procedures or any other documentation related to this Code. In some higher risk instances, we may undertake an on-site or desk-based audit of suppliers to validate your adherence to this Code and applicable Group Third Party Policies.

Note: The provisions in this Code are in addition to the terms of your supplier agreement with the Bank. If there is any inconsistency between this Code and the terms of your supplier agreement with the Bank, the order of priority for the purposes of construction will be that your agreement terms take precedence over the content of this code.

8. Our Commitment to You

We commit to:

- Supporting an ethical, inclusive, and accessible supply chain.
- Supporting opportunities to reduce adverse environmental and climate impacts.
- Working closely with you to share expertise in developing innovative, high-quality products and services and in effectively managing risk.
- Engaging with you and others in your markets in ways that ensure we achieve the best value for customers in terms of price, quality, and social impact.
- Building strong, collaborative relationships with our strategic suppliers and helping you to understand the regulated environment in which we operate so that you can support us in achieving our purpose.
- Providing clear guidance about our payment procedures.
- Reviewing this Code regularly as our approach to responsible sourcing evolves.

9. Group Associations and Useful Links

The Group has committed to aligning with a number of mandatory and voluntary frameworks specifically related to responsible business and sustainability, including:

Mandatory Commitments	Voluntary Commitments
<ul style="list-style-type: none">• Corporate Sustainability Reporting Directive (CSRD)• Corporate Sustainability Due Diligence Directive (CSDDD)• EU Taxonomy• EBA Sustainable Finance Pillar 3 ESG Disclosures• EU Sustainable Finance Disclosure Regulation (SFDR), applicable to Group entities New Ireland Assurance Company plc, Davy, and Bank of Ireland Investment Markets• Regulatory expectations on climate change as set out by the European Central Bank (ECB), and the Prudential Regulatory Authority (PRA) for BoI UK plc and the Basel Committee on Banking Supervision	<ul style="list-style-type: none">• UNEP FI Principles for Responsible Banking• UN Principles for Responsible Investment• UN Principles for Responsible Banking 'Commitment to Financial Health and Inclusion.'• CDP (formerly The Carbon Disclosure Project)• UN Sustainable Development Goals (UN SDGs)• Science Based Targets Initiatives (SBTi)• Partnership for Carbon Accounting Financials• Taskforce for Nature-related Financial Disclosures• Partnership for Biodiversity Accounting Financials• All-Ireland Pollinator Plan• UNPRB Nature Target-setting Working Group• Circuléire• Business in the Community Ireland's Low Carbon Pledge and Elevate Pledge• ISO 50001 Energy Management System and ISO 14001 Environmental Management System (EMS)• UNEP FI Pollution Working Group

Useful Links

- Group Reports, Policies, Code of Conduct and Modern Slavery & Human Trafficking Statement - [Investor Resources - Bank of Ireland](#)
- FSQS - [Financial Services Supplier Qualification System \(FSQS\) | Bank of Ireland](#)

We want to hear from you

- Please contact us with any feedback or questions you may have:

