



# The Barclays Way

How we do business

July 2022



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# The Barclays Way...

The Barclays Way is our code of conduct, setting the standards of behaviour we should all follow every day. It isn't an instruction manual or a prescriptive list of do's and don'ts, but is a touchstone for everyone at Barclays on the standard of conduct we expect. It is designed to support all colleagues to exercise their good judgement and to make the right decisions each day.

Please take the time to familiarise yourself with what is included in these pages. As you would expect, our approach starts with our Purpose, Values and Mindset. Our Purpose is to deploy finance responsibly, acting for the common good and the long term. Everything we do for our stakeholders should be in support of the fulfilment of that. Our Values are our moral compass as a company. Our Mindset – to Empower, Challenge and Drive – is how we take action.

The Barclays Way translates these important principles into a way of working across our company. It applies to every colleague, in every place in the world where we do business. It guides us in terms of how we can best support our customers and clients, as well as how we can continue to build a respectful and diverse colleague culture, and one in which speaking up is valued. There is also specific guidance included here to help you think about managing risk, maintaining strong governance and robust controls, and achieving the highest ethical standards in your conduct.

I remain incredibly proud of the way colleagues consistently demonstrate the best of Barclays. It is clear to me that The Barclays Way resonates across our company, and I hope it will continue to support the dedicated effort of colleagues across the organisation.

## Nigel Higgins

Group Chairman



# The Barclays Way...

The experience of the pandemic underlined the importance of finance to society. When used in the right way, finance is an anchor for economic and social stability, supporting individuals and businesses to achieve their goals and fostering sustainable growth in our communities. Our commitment to deploy finance in this way is for the benefit of our stakeholders. It is what gives Barclays its social purpose, but it is also critical to our long-term commercial performance as a company.

The Barclays Way locks this approach into our organisation, ensuring we are exhibiting the right behaviours and applying the highest possible standards in our working lives. This includes the way we interact with customers and clients and the approach we take to supporting them, but also applies to relationships with others, including business partners, suppliers, governments and regulators. Just as importantly, The Barclays Way applies to the way we interact with each other. Exhibiting the right behaviours at work is an important part of getting our culture right. That includes being alert and vigilant to risks within our business, taking personal initiative and responsibility for building strong controls and for identifying and fixing problems if they arise.

The Barclays Way reflects the trust that millions of people place in us every day. That trust is earned by repeatedly doing the right thing, and the best way to build that trust is to invest in our culture and support our people in the choices they make.

## C.S. Venkatakrishnan

Group Chief Executive Officer





# The Barclays Way...

## **What this means for you**



# Our Purpose

Our Purpose is the reason our company exists; the societal need we fulfil. Our Purpose is:

Finance is the oxygen of the economy. Acting transparently and with expertise, **we deploy finance responsibly to support people and businesses**. We have the capability and capital, the operational resilience and the commitment, to make a real and lasting difference to the economic lives of customers and communities. This is as true today as it was when our bank was founded over 330 years ago

**Acting with empathy and integrity**, we aim to be a leader in the profession of banking and to engender trust amongst our key stakeholders. We understand the power of building a supportive and inclusive culture for everybody, knowing that we make a bigger difference when we pull together as one team

We operate with energy and imagination, **championing innovation and sustainability**, to make a positive and enduring difference, to take pride in leaving things better than we found them. New ideas and technologies can help customers and communities to unlock opportunities

Our success is judged not only by commercial performance, but also by our contribution to society, and how we act responsibly **for the common good and the long term**, because these outcomes are mutually dependent. We are at our best when our clients, customers, communities, and colleagues all progress.

**This code of conduct outlines the Purpose, Values and Mindset which govern our way of working across our business**



# What this means for you

This code of conduct outlines the Purpose, Values and Mindset that govern our way of working across our business. It is a reference point covering all aspects of colleagues' working relationships, and provides guidance on working with colleagues, customers and clients, governments and regulators, business partners, suppliers, competitors and the broader community.

The behavioural standard set by The Barclays Way applies to every Barclays colleague, in every country. Other subsidiaries in which Barclays has a minority interest, and joint ventures in which the bank participates, are encouraged proactively to adopt an equivalent approach. This also applies to any other entities or individuals contracted by Barclays to do work on the bank's behalf.

- Barclays takes the Values and Mindset behaviours, set out in The Barclays Way, very seriously
- It's every colleague's responsibility to be aware of and understand this code of conduct and the policies that apply to our roles, and to act in line with them
- Colleagues who are unsure what course of action to take should check local policies, or with their line manager, or a senior manager. It is expected that, when unsure of a matter, colleagues will err on the side of caution
- Colleagues are required to undertake annual training, which includes an assessment to confirm understanding of The Barclays Way
- Any failure to act in accordance with the Values and Mindset behaviours or breaches of this code of conduct may result in disciplinary action, up to and including dismissal
- All colleagues' performance is measured against 'what' they deliver (their objectives) and 'how' they achieve this (their demonstration of our Values and Mindset behaviours)
- Relationships may be terminated with third party providers who demonstrate poor ethical standards or fail to live up to Barclays' Values.

# The Barclays Way...

## **At a glance**





# A summary of our Purpose, Values and Mindset



Finance is the oxygen of the economy. Acting transparently and with expertise, **we deploy finance responsibly to support people and businesses**. We have the capability and capital, the operational resilience and the commitment, to make a real and lasting difference to the economic lives of customers and communities. This is as true today as it was when our bank was founded over 330 years ago.

**Acting with empathy and integrity**, we aim to be a leader in the profession of banking and to engender trust amongst our key stakeholders. We understand the power of building a supportive and inclusive culture for everybody, knowing that we make a bigger difference when we pull together as one team.

## Purpose

**The reason Barclays exists;  
the societal need we fulfil**

We deploy finance responsibly to support people and businesses, acting with empathy and integrity, championing innovation and sustainability, for the common good and the long term.

We operate with energy and imagination, **championing innovation and sustainability**, to make a positive and enduring difference, to take pride in leaving things better than we found them. New ideas and technologies can help customers and communities to unlock opportunities.

Our success is judged not only by commercial performance, but also by our contribution to society, and how we act responsibly **for the common good and the long term**, because these outcomes are mutually dependent. We are at our best when our clients, customers, communities, and colleagues all progress.

### Respect

We harness the power of diversity and inclusion in our business, trust those we work with, and value everyone's contribution.

### Integrity

We operate with honesty, transparency and fairness in all we do.

### Service

We act with empathy and humility, putting the people and businesses we serve at the centre of what we do.

### Excellence

We champion innovation, and use our energy, expertise and resources to make a positive difference.

### Stewardship

We prize sustainability, and are passionate about leaving things better than we found them.

## Values

**Our moral compass;  
what we believe is right**

Respect. Integrity.  
Service. Excellence.  
Stewardship.

## Mindset

**How we get  
things done**

Empower.  
Challenge. Drive.

### Empower

Trust and support each other to deliver. Make decisions with those closest to the topic. Include diverse perspectives. Celebrate success and learn from failure.

### Challenge

Question whether things can be done better. Use insights based on data to inform decisions. Be curious about how we can adapt and improve. Speak up and be open to alternative viewpoints.

### Drive

Focus on outcomes. Deliver with pace. Be passionate and ambitious about what we do. Take personal responsibility. Actively build collaborative relationships to get things done.

**The power of who we are is greatest when we are bound together by a common Purpose, shared Values and a single Mindset**

Find out more about our Mindset behaviours and how we make decisions and take action.

# The Barclays Way...

# **How we behave**



# How we behave

Our five Values are our moral compass; the fundamentals of who we are and what we believe is right. Our Mindset (Empower, Challenge, Drive) shapes how we take action, living by our Values, driven by our Purpose, always with our customers and clients at the heart of what we do.

We apply our Values and Mindset consistently across the bank in everything we do. This means that we act fairly, ethically and openly and abide by standards which are, in many cases, higher than those set by the laws and regulations which apply to our business. And it means that we get things done.

In doing this, we apply a range of criteria over and above financial considerations, aimed at building a sustainable, strong and profitable business for the long term and adding value to our business relationships and the broader communities in which we live and work.

We benchmark our individual and corporate performance not just on commercial results, but also on how we demonstrate our [Values](#) and [Mindset behaviours](#) in our daily work.

As employees of Barclays we are all personally accountable for what we do every day. Personal accountability is central to our culture. How we behave is instrumental in achieving the highest standards of performance, adding value to our customers and clients and meeting our regulatory obligations.

In order to achieve this, we expect colleagues to:

1. Act with integrity
2. Act with due skill, care and diligence
3. Be open and co-operative with regulators
4. Treat customers fairly
5. Observe proper standards of market conduct.

Find out more about our Mindset behaviours and how we make decisions and take action.

Although these expectations apply in particular as part of the Individual Accountability Regime, Barclays expects all colleagues to comply with these requirements. Colleagues should therefore familiarise themselves with and adhere to the relevant policies, standards and supporting documentation covering the Individual Accountability Regime.

**As employees of  
Barclays we are all  
personally accountable  
for what we do every day**





## Our role in society

Banks play a key role in connecting the providers and users of capital. Barclays recognises this role in serving society, and our success as a business has always been inextricably linked to the progress of the people, communities and businesses that we serve. As society's expectations of businesses continue to evolve, we aim to stay ahead of those expectations. It is by focusing on our core products and services, and our relationships that we can make the greatest positive impact.

We know that our success over the long term is based not just on how well we run the organisation commercially, but also on how well we manage it to protect the environment, support positive social progress, and make responsible, well-governed decisions.

We are focused on the areas where we can have the greatest long term impact: making growth 'green', sustainable and inclusive; managing the environmental and social impacts of our business; running a responsible business; and investing in our communities.

## Supporting our communities

We believe that a strong, inclusive economy is a better economy for everyone. Through our global Citizenship programmes, Unreasonable Impact and LifeSkills, Barclays is helping businesses to create jobs and enabling people to develop the skills and confidence they need to succeed now and in the future. Barclays works together with experienced partners, employability experts and businesses that are hiring to develop meaningful and innovative programmes that deliver a significant positive impact over the long term.

### In doing this we:

- Partner with leading charities and not-for-profit organisations to deliver impactful programmes in the communities where Barclays operates
- Support colleagues in undertaking volunteering and charitable matched fundraising in their local communities.





# Addressing Sustainability & ESG

Addressing climate change is an urgent and complex challenge. It requires a fundamental transformation of the global economy, so that society stops adding to the total amount of greenhouse gases in the atmosphere.

The financial sector has a critical role to play in supporting the economy to reach this goal and Barclays is determined to play its part. In March 2020, we announced our ambition to be a net zero bank by 2050, becoming one of the first banks to do so.

## In doing this we:

- Operate in accordance with the International Bill of Human Rights, and take account of other internationally accepted human rights standards, including the UN Guiding Principles on Business and Human Rights (UNGPs). We respect and promote human rights through our employment policies and practices, through our supply chain screening and engagement and through the responsible provision of our products and services
- Manage our environmental impact through financing the growth of renewable energy sources and next generation technologies, taking a responsible and sustainable approach to the financing of energy sources with a higher environmental impact where that continues to still be necessary for the economy. We aim to maintain and improve our progress on reducing the carbon footprint of our own operations and supply chain throughout the world.

We have a strategy to turn that ambition into action:

1. **Achieving net-zero operations:**  
Barclays is working to achieve net zero operations and reducing supply chain emissions, investing in the continued decarbonisation of our operations, and in the development of a net zero pathway for the emissions from our supply chain.
2. **Reducing our financed emissions:**  
Barclays is committed to aligning its financing with the goals and timelines of the Paris Agreement.
3. **Financing the transition:** Barclays is providing the green and sustainable finance required to transform the economies we serve.

# Customer/Client – delivering excellent service

Barclays strives to create and maintain mutually beneficial long-standing relationships with personal, business, institutional and international customers and clients. We want these relationships to meet our customers and clients' needs and exceed their expectations. This means taking personal responsibility for understanding the financial advice and support that they need to achieve their goals. It also means ensuring that creative solutions are provided that enable our customers and clients to make well-informed choices in support of their short and long term goals.

Our objective is to offer good value and to deliver this via excellent and consistent service. We take pride in our reputation for providing innovative products and ideas that allow us to help our customers and clients manage their financial affairs better, thereby making a real and lasting difference to their lives, to the economy and to our and communities.

## In doing this we:

- Communicate clearly without jargon and are transparent about fees and charges, ensuring these are fair and reasonable
- Conduct sales, advertising and marketing of our products and services with integrity and do not make false, misleading or exaggerated claims
- Do not offer customers and clients products that are not right for them
- Maintain confidentiality of customer and client information
- Deliver on our promises and take personal responsibility for putting things right when they go wrong
- Resolve complaints diligently, fairly and quickly
- Take a responsible approach to clients who find themselves in financial difficulty
- Evaluate the broader risks and impacts of business propositions and products to anticipate and rectify adverse effects
- Avoid undeclared actual or potential conflicts of interest, or behaviour that may be perceived as a conflict of interest. This may be an actual or perceived conflict between an individual's personal interests and the interests of Barclays as a whole (including our shareholders, supplier relationships, customers and clients), a conflict between the interests of two or more clients, or a situation where Barclays prioritises its own interests over those of suppliers, customers and clients. Where we cannot avoid such conflicts, we are transparent about their existence and the steps taken to manage them proactively.

**Our objective is to offer good value and to deliver this via excellent and consistent customer and client service**

# Colleague – promoting respect, diversity and performance in the workplace

We want to make Barclays a great place to work, where we harness the power of diversity and inclusion in our business, trust those we work with, and value everyone's contribution. We collaborate with colleagues across the bank to deliver the best result for our stakeholders. We demand excellence and acknowledge – and take pride in – our achievements.

We foster a working environment in which colleagues are trusted, take responsibility for both success and failure – without allocating blame – and are encouraged to challenge decisions or behaviours they believe are wrong. Doing the right thing, and having the courage to speak up even when it feels uncomfortable, is an important aspect of The Barclays Way. No-one should experience any form of retaliation, of any kind, as a consequence of reporting an issue or for speaking up.

**We want to make Barclays a great place to work, where we harness the power of diversity and inclusion in our business, trust those we work with, and value everyone's contribution**

## In doing this we:

- Act and are seen to act with the highest standards of conduct and integrity
- Challenge and escalate issues of concern in a fair and clear manner
- Welcome and foster diversity within our workforce
- Take a no-tolerance approach to bias, bullying or harassment
- Are committed to developing and maintaining our professional knowledge and skills
- Support and coach colleagues in developing their skills and career and provide them with the necessary training and tools, including constructive feedback on their performance and behaviours
- Take personal accountability for achieving high performance by setting challenging and stretching targets for ourselves and expect this of others
- Are open minded to, and respectful of, others' points of view
- Recognise and celebrate colleagues' achievements
- Evaluate and compensate performance on the basis of how objectives are met, as well as what is delivered
- Seek to employ and retain people who are exemplars of The Barclays Way of working
- Behave in a way that demonstrates that every single role within the bank is important, as are the people who occupy those roles
- Recognise colleagues' right to freedom of association and to participate constructively in dialogue with trade unions, work councils and other employee organisations
- Provide a safe and healthy working environment recognising that work/ home balance is important and aids overall health, wellbeing and productivity
- Make colleagues with line management responsibility aware that they have an additional obligation to ensure that their teams are effectively supervised and supported to meet the high standards expected of us all and that they lead by example at all times.

## Colleague conduct

Barclays expects that all colleagues act, and are seen to act, with the highest standards of conduct and integrity and in a way that promotes a diverse and inclusive culture. It is expected that colleagues will apply sound judgement and common sense to their standards of behaviour at all times, be guided by the Barclays Values and Mindset and act within the law.

This applies at all times to behaviour at work and work related meetings or where colleague conduct may impact their ability to carry out their role, or affect the reputation of Barclays. For example, colleagues are required to:

- Be reliable and punctual
- Present a professional appearance at all times as appropriate to their working environment
- Be able to carry out their jobs safely and effectively
- Keep our working environment free from smoke (including simulated devices such as e-cigarettes), gambling and substance use
- Respect and value people from all backgrounds. Barclays will not tolerate discrimination, bullying or harassment, including in relation to any employees, clients, customers, contractors, suppliers or other stakeholders and visitors to its premises
- Behave appropriately at all work-related social events, and never act in a way inside or outside of work that brings Barclays into disrepute.

## Matters requiring disclosure

All Barclays employees are required to inform their line manager or other appropriate contact of the following circumstances:

- Any conflict of interest or outside business interest
- Police arrest or caution, conviction for a criminal offence, judgements<sup>1</sup>
- Any actual or threatened litigation against them that would likely have an impact on Barclays, reputational or otherwise
- Changes in legal right-to-work status
- Any adverse credit judgements<sup>2</sup>
- Personal relationships at work, where the relationship may give rise to an actual or perceived conflict of interest. This may include relationships with someone in your line management chain or where you are involved in supervising or making commercial decisions which could impact the person with whom you have a personal relationship
- Politically exposed person status or personal relationship (e.g. family or friend) to a client, customer, public official, regulator or other external stakeholder who has the authority to award business to Barclays or otherwise influence Barclays' interests (as required by Barclays ABC Employment & Work Opportunity Standard).

These requirements apply to all business areas, subject to local policies, standards and supporting documentation and to any restrictions imposed by applicable local laws.

<sup>1</sup> Unless local legislation expressly provides that the conviction does not have to be disclosed for the role you are carrying out.

<sup>2</sup> If the requirement to provide this information is permitted by local law.



# Managing risk – maintaining strong governance, robust controls and high ethical standards

At Barclays we use our energy, skills and resources to deliver high quality, sustainable results, taking account of the longer term as much as immediate achievements. We are committed to transparency in our disclosures and reporting, and to delivering a fair return to shareholders.

In managing our business, we appreciate that conducting our global activities with integrity and high standards of ethical conduct is fundamental to maintaining the trust and confidence of our stakeholders, including clients and regulators. We have no tolerance for detriment to customers, clients, market integrity, effective competition or Barclays due to willful misconduct.

Barclays' Enterprise Risk Management Framework (ERMF) governs the way in which we identify and manage our risks. All employees, regardless of their position, function or location, must play their part in the firm's risk management.

Employees are required to be familiar with risk management policies, standards and supporting documentation which are relevant to their responsibilities, know how to escalate actual or potential risk issues, and have a role-appropriate level of awareness of the risk management process as defined by the ERMF.

Where we engage with governments and regulators on issues relevant to our business, we are honest and transparent in our communication with them. Barclays is politically neutral. We do not participate in party political campaigning or make party political contributions.

In managing our relationships with third-party service providers, we seek mutually beneficial relationships based on value and work through our supply chain to ensure that related environmental, social and ethical impacts are identified and managed appropriately. We acknowledge that free, fair and inclusive competition is good for business, customers and clients, driving innovation and improvements in service provision.

## In doing this we:

- Ensure that information is prepared in accordance with regulation and best practice standards and is sufficiently comprehensive to enable shareholders and other stakeholders to make an informed assessment of both our strategies and our future prospects
- Take care to protect and enhance our reputation in everything that we do – our brand is more important to long term value and sustainable growth than short term profits
- Ensure that all information in our external and internal communications is honest, accurate, clear and timely
- Make sure colleagues are familiar with and understand the controls and governance relevant to their roles, and that they undertake the relevant mandatory training
- Take action in relation to anyone working for Barclays who does not act in a manner consistent with this code
- Keep within the spirit, as well as the letter, of the law and regulation and apply high standards of professional and ethical conduct at all times

- Practice responsible risk management and due diligence in our decision making
- Apply clear standards to tax planning for customers, clients and on our own account to ensure Barclays' Tax Principles are upheld and we are fully compliant with the UK Code of Practice on Taxation for Banks
- Take a no-tolerance approach to the willful facilitation of tax evasion in any country
- Take a no-tolerance approach to bribery and corruption wherever it is encountered and do not make facilitation payments of any kind
- Maintain an open, clear and transparent dialogue with our regulators and ensure all communications are timely, accurate and comprehensive – working with the Regulatory Relations team as appropriate for any regulatory engagements
- Do not offer, accept or solicit gifts or entertainment inappropriately as an inducement or means of influencing actions or opinions. Guidance on what is and is not acceptable is provided via the Barclays Anti-Bribery & Corruption (ABC) Expenditure Standard and relevant business procedures
- Do not share commercially sensitive information with competitors or enter into any agreements of a formal or informal nature with them to: fix or set prices, salaries or interest rates, restrict the supply of goods or services, engage in bid rigging or joint boycotts, allocate markets, refrain from poaching employees or engage in any other anti-competitive practice
- Ensure that any engagement with public officials is in accordance with the mandatory procedures underpinning the Government Relations Standard, and follow guidance from the Government Relations team for your jurisdiction
- Ensure that any colleague involved in politics in a personal capacity keeps this entirely separate from their work at Barclays and strives to avoid any association between their politics and the bank, including ensuring that there is no actual or perceived conflict with their duties and responsibilities to the organisation
- Promote an inclusive supply chain through the engagement and utilisation of small and medium-sized enterprises and businesses majority owned, controlled and operated by socio-economically under-represented segments of society (ethnic minorities, women, lgbt, military veterans, service-disabled veterans, persons with disabilities, social enterprises)
- Ensure all interactions with external stakeholders (excepting customers and clients) in a professional capacity are managed and approved by an appropriate person within the relevant stakeholder team
- Do not seek to damage the reputation of competitors directly, by implication or innuendo.



A photograph of three women sitting around a table in a modern office setting, engaged in a discussion. The woman on the left, with dark wavy hair and a pink sweater, is gesturing with her hands while speaking. The woman in the middle, with long brown hair and a white turtleneck, is listening attentively. The woman on the right, with short dark hair, glasses, and a grey sweater, is also listening. Large windows in the background show green foliage.

# The Barclays Way... **Speaking up and raising concerns**



# Speaking up and raising concerns

Colleagues should be able to take great pride in being associated with Barclays. This is why we must all be vigilant in ensuring that we live up to the Values and act with a Barclays Mindset; these underpin our business and govern everything we do in our daily work.

## Speaking up

Barclays is committed to having a strong 'speak up' culture. This means creating a respectful and inclusive environment where everyone feels supported to share their thoughts and views, and to offer positive and constructive challenge, in their day-to-day work. It's also about ensuring everyone feels confident to call out when they see behaviours and practices that are not in line with our Barclays Values, knowing that speaking up - whether informally during everyday interactions or through a formal process like whistleblowing - will not come at a consequence to them. 'Speak up and be open to alternative viewpoints' is so important to Barclays that it is a key Mindset behaviour under 'Challenge'.

**"We're all committed to providing a respectful, inclusive environment to work in, and encourage you to speak up about actions and behaviours which have no place at Barclays"**

**– Group ExCo**





## Raising concerns

Speaking up offers real benefits for the business and for colleagues; that's why it is encapsulated in one of the Mindset behaviours, 'Challenge'. As a colleague, if you have a concern about the work we do, what you see or hear around you at work or the treatment that colleagues receive at work we encourage you to speak to your line manager if you feel comfortable doing so. All line managers are expected to encourage colleagues to speak up without fear of repercussion and take action to support any member of their team that does.

Your line manager, a member of the management team or a colleague in HR, Compliance or Legal will usually be the most appropriate person to speak to about any concern you may have and you should use these channels in the first instance. If, however, for whatever reason you are not comfortable doing so, then the Raising Concerns process is available to you.

The Raising Concerns Team will carefully assess concerns received and refer them to the most appropriate team for review and possible investigation.

It is important to remember that all matters raised through the Raising Concerns process will be treated seriously, reviewed by an appropriate team, and, where appropriate, investigated. The Raising Concerns team will manage all concerns sensitively and confidentially. Concerns could relate to a number of things, including a breach in our security, inappropriate conduct, financial crime, harassment, health, safety, environmental risks, or anything likely to harm the reputation of Barclays.

No-one should experience any form of retaliation, of any kind, as a consequence of reporting an issue or speaking up. If you have raised a concern, either to the Raising Concerns Team or otherwise, and believe you are now suffering detriment as a result, you should let the Raising Concerns Team know at the earliest opportunity.

If your concern is referred to the Whistleblowing Team by the Raising Concerns Team, be assured your concern will be taken seriously. We know it is not always easy to raise a whistleblowing concern, so the Whistleblowing Team are in place to support and guide you through the process.

If you have provided your contact details, a member of the Whistleblowing Team will contact you and help you understand how your concern will be taken forward. They may request additional information or clarification on certain aspects of your concern.

You can be assured that all investigations are conducted in a thorough and proportionate manner and you will be kept updated throughout the process and once the investigation is complete.

There are a number of ways to raise a concern, details can be found at the following link: <https://content.now.barclays.intranet/a/raising-concerns/> or just type **Raising Concerns** into your Barclays intranet browser for more information.

# Supporting The Barclays Way...

## **Policies and guidance**



# Supporting The Barclays Way...

## Policies and guidance

Barclays has a range of policies, standards and supporting documentation setting out the control objectives, principles and other core requirements for the activities of the bank. Unless there are specific regulatory or statutory requirements in particular jurisdictions, all policies, standards and supporting documentation are expected to apply Group-wide.

For a complete list of policies and standards, colleagues should refer to the Global Policy Portal on Barclays Now (the intranet). Colleagues should also refer to their local procedures, handbooks and guidance.

**Barclays has a range of policies, standards and supporting documentation setting out the control, objectives, principles and other core requirements for the activities of the bank**



# The Barclays Way...

# Questions and answers





# Questions and answers

## **What should I do if local law conflicts with other laws, internationally accepted standards or Barclays' own policy?**

If the provisions of this Code, internationally accepted standards or Barclays' policy conflict with any local laws, you should discuss this with your line manager or local HR or local Compliance teams. In some circumstances local laws may, for example, prevent the disclosure of certain convictions or other information (such as credit information). In such circumstances we must adhere to those local laws and policies, standards and supporting documentation will be adapted locally to reflect this.

## **What should I do if I have concerns that a certain decision or way of working is not in keeping with The Barclays Way?**

Your line manager or a colleague in HR, Compliance or Legal will usually be the most appropriate person to speak to about any concern you may have and you should use these channels in the first instance. If, however, for whatever reason you are not comfortable doing so, then the Raising Concerns process is available to you (see page 20).

## **What should I do if a client or supplier (or potential client or supplier) offers me tickets to a major entertainment or sporting event?**

You should refer to the Barclays ABC Expenditure Standard that provides criteria for the acceptance of hospitality. If you are still not clear what is or is not permissible, you should consult your local Compliance team.

## **What should I do if I am attending a meeting or event with competitors and there is discussion about competitors' pricing strategy or other confidential information?**

If you find yourself in this situation you should ask the meeting or event participants to desist from the discussion. If the discussion nevertheless continues, you should leave the meeting immediately, making sure that your objections to the discussion are noted. In all cases, you should report the incident to your line manager and to the Barclays Competition Legal team or your usual Compliance or Legal contact, as soon as possible after the meeting.

## **What should I do if I am a politically exposed person (PEP) or I have a family connection to a client/customer/public official/ regulator or other external stakeholder?**

In certain circumstances, your PEP status or family connections may create a conflict of interest and/or a bribery and corruption risk. You should speak to your line manager in the first instance and consider whether you are required to take any action, e.g. making a formal disclosure of your PEP status or personal relationship to an external stakeholder, under the Barclays ABC Employment and Work Opportunity Standard.

**What should I do if I am aware of, or am asked to participate in, any activity or decision designed to circumvent Barclays policy or regulation, or which appears to push the boundaries of accepted practice to an unacceptable (or potentially unacceptable) extent?**

If you feel that a decision or activity is not in keeping with Barclays' behavioural or policy commitments, your line manager or a colleague in HR, Compliance or Legal will usually be the most appropriate person to speak to about any concern you may have. If, however, for whatever reason you are not comfortable doing so, then the Raising Concerns process is available to you (see page 20).

**What should I do if I am suspicious that a client or colleague is engaged in fraudulent or other illegal activity?**

If the concern relates to a suspicion that a customer or client is engaged in fraudulent or other illegal activity then in the first instance this should be raised with the relevant Fraud team. However, if the concern relates to possible employee wrongdoing/ involvement then the matter can be raised directly with your line management or through the Raising Concerns Team.

**I am thinking of campaigning for a local political candidate, is there anything I need to do before going ahead?**

If undertaking political activity you should ensure that this is conducted in a personal capacity, in your own time, and does not make use of Barclays' resources or place Barclays' reputation at risk. Any substantial commitment should be approved by your line manager. If you are based in the United States and want to get involved in political volunteering activity you must get prior approval from local Compliance.

**My line manager is very supportive of Citizenship activity and has recommended that I attend a charity fundraising event that s/he is organising and apply for support through the Barclays Matched Fundraising programme. I don't really know the charity, so should I attend and apply for matching?**

The matched fundraising programme is available to support your fundraising efforts for the cause that you choose, so long as it meets the programme guidelines. The choice of charitable organisation or the decision to take part in an activity must be your own, and not influenced or requested by others e.g. your line manager, colleague, client or customer, charity or events management companies. It is therefore up to you to decide if this is the activity that you would like to be actively involved in and to put your matching towards. While colleagues and managers may share opportunities for you to take part in, you should not feel compelled to be involved if you have other activity that you would rather support.

**I've been asked by an external Barclays supplier/client to fundraise for a charity and use Barclays matching. Can I do that?**

This could be perceived as a conflict of interest, particularly if you have a direct relationship or any kind of influence over the supplier or client/customer relationship. The Barclays Matched Fundraising programme was set up to support colleagues' personal fundraising efforts; it is not to be used as a business relationship enhancement. As such activity might present an actual or perceived conflict of interest. For any concerns, please contact your local Compliance team.



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