HUMAN RIGHTS POLICY STATEMENT

Lloyds Banking Group
2020
A responsible and sustainable approach to doing business is central to our strategy and our purpose to help Britain prosper. We believe in the importance of doing business in ways that value and respect the human rights of our colleagues, customers, business partners and everyone that is affected by our business and we have a set of policies and procedures to translate this belief into action.

This Statement applies to Lloyds Banking Group plc, its subsidiaries, employees and officers of the Group for the financial year ending 2020. This Statement was approved in February 2021 by the Board of Lloyds Banking Group plc on behalf of all the Group’s subsidiaries, and by the Boards of its principal subsidiaries Lloyds Bank plc, Bank of Scotland plc and HBOS plc on behalf of the Ring Fenced Bank sub-group. The Boards of Lloyds Bank Corporate Markets plc and Scottish Widows Group Limited approved the Statement on behalf of the Non Ring Fenced Bank sub-group and the Insurance sub-group respectively.
We adhere to the rules and regulations of every country in which we operate. We are also guided by the International Bill of Human Rights as well as the International Labour Organisation’s (ILO) Core Labour Standards and its Tripartite Declaration of Principles.

As signatories to the United Nations (UN) Global Compact, we are aligned with its human rights and labour standards, and report on our progress annually. We also recognise the Organisation for Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises and the UN’s Guiding Principles on Business and Human Rights.

In addition, we support the UN’s wider development agenda including the UN Sustainable Development Goals (SDGs) and are signatories to the UN Principles for Responsible Investment (UNPRI) and the UN Environment Programme Finance Initiative (UNEP FI) Principles for Responsible Banking, which are designed to accelerate the banking industry’s contribution to achieving society’s goals as expressed in the SDGs and the Paris Climate Agreement.

Pursuant to the UK Modern Slavery Act 2015, we produce a Modern Slavery Statement on an annual basis. This statement outlines the steps we take to combat modern slavery and human trafficking in our business and supply chains, how we monitor our business and supply chains for modern slavery risks, the steps we take to support survivors of slavery and our focus areas for the year ahead.

Together, these actions demonstrate the Group’s commitment to doing business responsibly and to explaining the meaningful steps the Group is taking to respect workers’ fundamental rights and freedoms.
This Policy Statement provides an overview of the work we do to support and protect human rights within our business and communities. It has been developed by consolidating the Group’s guidance and policies that relate to human rights and identifying further opportunities to integrate human rights decision making into our business operations.

We made significant updates to this Policy Statement in 2019 and have again reviewed it for 2020. It has been informed by a business-wide materiality assessment undertaken in 2019 which looked for issues that may affect the business, and considered expectations from stakeholders, including investors, academics, industry and community leaders. From this assessment, we identified the risks that needed to be managed and opportunities for us to improve human rights outcomes for rights holders. The human rights priorities for Lloyds Banking Group are inclusion and diversity, mental health in the workplace, supporting vulnerable customers, tackling modern slavery, and protecting customer privacy and data security to keep our customers’ money and data safe.

The coronavirus pandemic (Covid-19) has created serious challenges for all of society and created a range of human rights risks, from securing health to labour exploitation. This has been a test for all our stakeholders, but by applying our robust policies and adapting our responses, we have sought to take steps to make a positive contribution to the lives and livelihoods of a number of our customers. For instance, we have put in place additional support for those who need it, including those with mental and physical health conditions and those impacted by domestic and financial abuse.

Policy Statement structure
The main section of this Policy Statement covers (i) human rights for workers; and (ii) non-labour related rights issues, across our four main stakeholder groups:

**PROVISIONS ON HUMAN RIGHTS FOR WORKERS**

- **Our Colleagues**
  - Read more pages 5 to 7

- **Our Suppliers**
  - Read more page 8

**PROVISIONS ON NON-LABOUR RELATED RIGHTS ISSUES**

- **Our Customers**
  - Read more pages 10 to 11

- **Our Communities**
  - Read more page 11
Provisions on human rights for workers

Our Colleagues

A number of policies and procedures support our commitment to operating responsibly and ethically, both as a business and at an individual level, and cover provisions for key human rights concerns. They help us to address primary areas of risk and translate our risk appetite into mandatory requirements.

These policies are developed and approved in accordance with formally defined governance structures and include our Code of Ethics and Responsibility, Group Colleague Policy, Health, Safety and Fire Policy, Group Data Policy, Security Policy, Harassment and Grievance Resolution Policy, Group Compliance Policy, Group Accountability Standards, Speak Up (whistleblowing) and Anti-Bribery Policy.

The Group is committed to meeting its statutory responsibilities as an employer. There is no appetite for non-compliance with relevant employment legislation. In addition, the Group does not tolerate the unfair treatment of colleagues, particularly on the basis of their legally defined personal characteristics: sex, age, disability, race, religion or belief, marital or civil partnership status, sexual orientation, transgender status or maternity status.

Our Values and Behaviours are the guiding principles for how we work. Our Code of Ethics and Responsibility (the Code) provides an overarching framework to ensure the highest possible standards of behaviour and underpins our approach to being a responsible, ethical, sustainable and inclusive business, for customers, colleagues, communities, the environment and our external stakeholders. The Code applies to all colleagues, contractors and temporary employees and includes a section that outlines the ways in which respect for human rights should inform colleagues’ and contractors’ actions and decisions. The Code encourages colleagues to report, through our whistleblowing service, Speak Up, or to their line manager, any actions that are unsafe, unethical, unlawful, or not in line with Group Policies. This year we have launched a new informal resolution channel ‘Let’s Talk’, to support colleagues in the UK to reflect on their concerns and understand their rights and options so that grievances can be effectively and appropriately resolved. If any human rights violations are identified, we take appropriate action swiftly.

Representation, recruitment and fair remuneration

We support colleagues’ rights to exercise freedom of association and have extensive collective bargaining processes in place – both in the UK and overseas. We have recognition agreements with two trade unions that collectively negotiate on behalf of our UK and Islands workforce (around 98 per cent of colleagues worldwide). Our relationship with these trade unions allows all parties to work together to improve the working environment and ensure colleagues are rewarded fairly for their contribution to the Group.

Our decision to become a UK Living Wage Employer in 2015 resulted from this approach. We review our pay rates annually to ensure minimum rates are above the statutory minimum and living wage requirements that are applicable in the countries we operate in. We have worked, and continue to work, with third-party contractors to ensure that they operate in line with our commitments and expect them to ensure that the wages they pay meet legally mandated minimums without unauthorised deductions.

The Group uses a number of recruitment agencies to fill roles. UK agencies are bound by contracts which require compliance with our Colleague Screening Standards and the Code of Supplier Responsibility, and which include specific Modern Slavery and Anti-Bribery clauses. UK agencies also attest compliance annually via the Financial Services Supplier Qualification System (FQS).

98%

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Building an inclusive bank

We recognise that everyone is different and we are working hard to build an inclusive bank that reflects the diversity of modern Britain. Getting this right is at the heart of our purpose of helping Britain prosper – a more inclusive society is a more prosperous society, and a diverse business is a better business. Our Group Inclusion & Diversity strategy is led from the very top, with Group Executive Committee (GEC) members championing the agenda. The key focus areas are: gender, ethnicity, disability and mental health, health & wellbeing (including support for parents and carers), LGBT+, agile working and domestic abuse. These areas are all sponsored by individual GEC members. We set targets for engagement and representation at senior levels in the Group to ensure we continue to make progress.

We have mandatory training for colleagues in the UK and overseas to ensure inclusivity is at the heart of what we do. In the UK, this includes a module on Cultural Capability, focusing on maintaining and building stronger relationships with colleagues, customers and clients, and Look Closer, which helps colleagues to create a positive working environment, free from discrimination, bias, harassment, or bullying. Training is supported by other internal initiatives, such as Dress for your Day, which aims to ensure colleagues feel comfortable and included in the workplace, by removing strict dress code requirements where appropriate. We have refreshed our performance management approach to foster an inclusive environment through the Back to your Best toolkit which emphasises getting to the root of any challenges and offers colleagues support to overcome those challenges, for instance through the Employee Assistance Programme. Additionally, our Courageous Conversations training is designed to support difficult management conversations, by showing leaders how to manage emotional reactions so that important conversations become positive and constructive.

We do not tolerate discrimination, harassment, bullying or victimisation in our business and deal with any colleague disputes and grievances fairly, following clear policies and procedures, including the ability to resolve issues informally.

We are proud to have been recognised externally for our work on inclusion and diversity, including:

- The Group has featured in the Times Top 50 Employers for Women for nine consecutive years and in the Bloomberg Gender Equality Index for the past two years.
- In 2020, we published our latest annual Ethnicity Role Models list, featuring 70 Black, Asian and Minority Ethnic (BAME) colleagues. These advocates champion the understanding of ethnic and cultural diversity, actively supporting and encouraging this across the Group.
- Over 200 BAME colleagues took part in our Authentic Leadership Programme for senior managers, our Career Development Programme for middle managers, and wider Sponsorship Programmes. In 2020 three of our colleagues were named in the celebrated EMpower Ethnic Minority Role Model lists – including two in the Ethnic Minority Executives List and one in the Ethnic Minority Future Leaders List. Those featured have not only achieved success in their own careers but have used this to actively drive for more inclusive workplaces.
- Our award-winning women’s network Breakthrough is the largest of its kind in the UK with 15,000 members and 4,000 mentors. We continue to be a sponsor of the Women of the Future Ambassadors Programme, providing mentors and role models to strengthen talent among young British women.
- We have created an inclusive and open working environment for our LGBT+ colleagues, with the Group named Top Financial Employer, and seventh overall in 2019’s Stonewall Top 100 employers which celebrates the pioneering efforts of leading organisations to create inclusive workplaces. The achievement is the culmination of a journey that has seen the Group placed in the top 10 since 2015, and first in 2017, recognising the progress made and our continued commitment to LGBT+ inclusion. Our LGBT+ colleague network, Rainbow, plays a pivotal role in our approach and, with over 5,000 members and supporters, it is one of the largest of its kind in the UK.
- We have been a Top 10 Employer for Working Families for five consecutive years, awarded by the charity Working Families.
- We are recognised as a leading employer for people with disabilities by the Business Disability Forum and hold their Gold Standard Benchmark. We also hold Disability Confident Leader status with the Department for Work and Pensions.

We have worked for a long time to become more inclusive and diverse – from our public goals to increase senior ethnic diversity to our comprehensive Ethnicity Strategy which aims to better unlock the potential of our Black, Asian and Minority Ethnic colleagues at all levels, building cultural awareness for all colleagues, and increasing the visibility of authentic role models from a wide range of backgrounds. The Black Lives Matter movement has prompted many individuals and organisations to pause, reflect and review what they can do to create an inclusive environment for all. We know that there is much more to do if we are to truly reflect the diversity of modern Britain and tackle barriers to inclusion, including those created by persistent, systemic inequalities in society.

Following in-depth listening sessions with colleagues, the Group is taking focused action in support of Black, Asian, and Minority Ethnic colleagues and has launched a ‘Race Action’ plan to drive cultural change, recruitment and progression across the Group. Commitments for 2020 onwards include:

- Setting a new public goal to specifically increase Black representation in senior roles to at least 3% by 2025.
- Working in partnership with external experts to develop a race education programme and tackling bias in the organisation.
- Setting up a new advisory board made up of Black, Asian and Minority Ethnic colleagues to influence and inform our ongoing diversity strategy and ensure we are making the right progress.
- Undertaking regular listening sessions to gauge our colleagues’ experiences and progress against our goal.
Championing mental health, safety and wellbeing

We are committed to achieving the highest standards of health and safety and wellbeing for our employees (and visitors to our premises). This is illustrated by our response to the Covid-19 pandemic: health and safety was the Group’s number one priority. We prioritised helping colleagues protect themselves, their families, their customers and their communities. For example, we rapidly invested in new equipment, systems and structures to enable as many colleagues as possible to work from home and created Covid-secure and effective working environments – whether on Group premises or at home.

Throughout, our approach was guided by the recognition that everyone’s circumstances are different and that certain groups have been disproportionately impacted by the pandemic, for instance due to health conditions and risk factors, ethnicity, caring and parenting responsibilities or living arrangements. The Group has introduced a number of measures to support vulnerable colleagues, from support for those living with domestic and financial abuse, to desks for colleagues who feel that being at home presents a serious risk to their overall health and wellbeing.

Increased focus on health and wellbeing has only been accelerated by Covid-19. In 2020, following 18 months of consultation with over 500 colleagues and our two recognised unions, we launched a new Health, Wellbeing and Attendance policy. This policy encourages a more empathetic and proactive approach to wellbeing and is focused on keeping colleagues well at work rather than managing absences and on colleagues and their line managers having great conversations rather than following a process.

As a Group we have particularly championed the importance of mental health for both employees and broader society, protecting fundamental rights to health and empowering people to achieve more. In the UK, our Mental Health Strategy supports colleagues and leaders through a Health and Wellbeing resource centre and we work to safeguard and promote colleague wellbeing by ensuring a psychologically sound working environment to help prevent work-related illness, and providing support and health advice in times of need. We regularly monitor stress-related absence where legally permissible and take action to reduce potential causes of strain such as adjusting the performance management framework. Through our Employee Assistance Programme provider, Validium, we provide a suite of wellbeing services for our employees in the UK and overseas, including mental health support. These services extend to debt advice, legal advice, health and wellbeing, and counselling. We try to help colleagues find a positive balance by providing opportunities such as flexible and agile working. We continue to review our offering and add to it to improve the colleague experience, for instance extending provision of mental health cover under medical benefits and creating a new resilience portal to help people enhance their overall wellbeing.

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Our Suppliers

Responsible sourcing is integral to the way we do business. It is important that we have the right framework to operate responsibly and we follow a due diligence process before selecting suppliers which evaluates them against key criteria, including their human rights programmes.

We expect suppliers to meet or exceed the provisions in our Code of Supplier Responsibility which we share through the supplier contract as governed by our Business Sourcing Process. It defines our expectations in terms of responsible business behaviour, including human rights and labour issues.

Our suppliers have a contractual obligation to comply with all applicable laws that apply to their supply of goods and/or services to us, regardless of the jurisdiction in which they operate. We go through an escalation and sign off process with the business to consider the risks of any supply contract, particularly where there is deviation from our standard clauses. Clauses related to modern slavery specifically are mandatory, however, and cannot be negotiated without legal support. We require those suppliers going through the FSQS (see below for further detail) to confirm they have read, understood and comply with the Code of Supplier Responsibility and provide us with evidence to demonstrate their approach.

As outlined in the Code, we expect our suppliers to respect human rights, both in their own workforce and those in their supply chain, including to:

- Explain the principles of the Code of Supplier Responsibility to their employees and key sub-contractors that support the Group or work on our projects
- Respect the human rights of their employees and comply with all relevant legislation, regulations and directives, including awareness and mitigation of the risk of modern slavery in the countries and communities where they operate including, where relevant, compliance with the UK Modern Slavery Act
- Prohibit forced labour (slavery) and human trafficking in their supply chain and give their employees the right and ability to leave employment if they choose
- Prohibit child labour
- Ensure that wages meet legally mandated minimums without unauthorised deductions
- Allow their employees to exercise the legal right to organise and join associations (such as labour unions)
- 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

To reinforce our responsible sourcing practices, our Sourcing & Supply Chain Management Policy makes it clear that we have no appetite for unethical treatment of our suppliers. Furthermore, all colleagues engaged in sourcing must follow the defined Business Sourcing Process and undertake sourcing in line with the requirements of our Sourcing & Supply Chain Management Policy. Compliance with our standards is monitored throughout our relationship with all suppliers and we help them to address any human rights violations that may arise. We assess our risk frameworks on a regular basis and provide specific training and guidance for specialist colleagues to support their effective implementation.

Provisions on human rights for workers continued
Provisions on human rights for workers continued

Financial Services Supplier Qualification System (FSQS)

Lloyds Banking Group subscribes to the FSQS, a third-party managed supplier qualification system for the financial sector that is currently used by more than 30 major banks, building societies and insurance companies. This ensures we adopt a standardised approach to compliance and assurance, which forms an integral part of our supply chain management.

We take a risk-based approach and contractually require our c.1,100 managed suppliers to self-attest their compliance to the Group’s policy expectations on an annual basis. As part of the FSQS, these suppliers are asked to provide evidence of processes and procedures for assessing and complying with relevant human rights legislation and labour standards, including the UK Modern Slavery Act. We require that suppliers identify human rights risks such as modern slavery in their supply chain and monitor and assess their suppliers’ human rights performance. Suppliers must complete the FSQS questions on an annual basis, and employees who manage the supplier relationship (Supplier Managers) must confirm that this is satisfactorily completed throughout the duration of the supplier’s contract with the Group. If a supplier provides a non-compliant answer to any responsible business FSQS question such as the occurrence of an employment tribunal in the last three years, or non-compliance with the UK Modern Slavery Act, Supplier Managers are required to investigate and manage through to resolution.

Where a supplier fails to meet the expectations set out in the Code, we commit to working with them to develop an improvement plan. If any issues are deemed sufficiently serious or cannot be resolved in a reasonable timeframe, the Group may undertake a review of the terms of the contract, which could include triggering the right to terminate where modern slavery issues (for instance) have arisen.

The Group regularly reviews the FSQS risk framework. In 2019 we introduced additional questions that trigger a ‘red flag’, prompting further investigative action and remediation. The Group Sourcing Supplier Assurance team conducts an annual programme of assurance reviews for suppliers which represent the highest risk exposure to the Group. Suppliers that trigger agreed risk criteria are selected for an onsite supplier assurance visit to test the supplier’s adherence to relevant Group policies, which include assessment of modern slavery risks as appropriate.

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Speak up

We encourage suppliers to speak up if they are concerned about any actions or decisions that contravene the standards set out in the Code of Supplier Responsibility and offer our suppliers access to our confidential Speak Up Line where they and their workers can report any incidents. An independent supplier manages the line and we have worked with them to ensure that, if instances of modern slavery or other human rights abuses are reported, they are identified and effectively investigated. This formal process is intended to be both sensitive and robust. The identity of those who raise a concern is not disclosed without their permission and there is an option to raise concerns anonymously. The Speak Up Third-Party Policy has been designed to assist in managing any risk that Third-Party Suppliers’ employees are prevented from reporting any concerns about risk, malpractice or suspected wrongdoing. There were no reported modern slavery incidents through Speak Up in 2020.
Our Customers

We have policies and procedures in place that help protect our customers from exploitation, including our Group Anti-Money Laundering and Counter Terrorist Financing and Fraud Risk Management Policies which also disrupt perpetrators, as well as our Group Data Policy and Security Policy. We take Data Privacy and our General Data Protection Regulation (GDPR) obligations very seriously and have a robust process to manage any risks.

We maintain a strong relationship both strategically and operationally with the Information Commissioner’s Office, which regulates these issues and which recognised the Group at a European Banking forum in October 2018 as “Leaders in the Industry”.

Retail customers

We have approximately 25 million retail customers and a presence in every nearly every community. We believe in being fair and transparent in everything we do, ensuring access to vital financial services that act as the foundation for many other human rights including access to housing and work. We have a Customer Policy that helps ensure we treat customers fairly and we provide customers with access to appropriate, affordable, responsibly structured credit; supporting them when they have financial difficulties, and investigating any complaints they have, thoroughly and fairly. We are sensitive to the challenges some people face in financial matters and through our financial inclusion and education programmes we focus on improving access to financial services and building financial skills.

We work with other financial service providers, NGOs, taskforces, law enforcement agencies and key organisations to help identify and prevent human rights abuses, such as modern slavery and human trafficking, by mitigating two key banking challenges survivors face: fraud and identification. This ensures that survivors do not become victims twice over. Working closely with charities such as Hope for Justice, Jericho Foundation, City Hearts, Medaille Trust and Crisis UK, we support former victims in accessing banking services by ensuring gangmasters’ fraudulent activity doesn’t prevent victims from holding a bank account. In the UK, our Acceptable Documentation procedures also allow for alternative forms of documentation when opening accounts as survivors of trafficking may not have these in conventional forms. Since testing this initiative at our Lloyds Manchester Flagship branch in 2017, we have expanded it to additional branch locations in partnership with a number of local and national charities. We have also introduced a central directory of resources and procedures so that colleagues at all branches across the Group can assist prospective customers that lack standard forms of identification.

Our Group Vulnerability Strategy outlines our approach to supporting those who may be more vulnerable or excluded, including those with mental health challenges, those with a critical illness, older customers, those with gambling issues and victims of domestic abuse, financial abuse, and modern slavery.

In recognition of our work supporting those with mental health challenges, Lloyds Bank has become the first ever firm to receive ‘Mental Health Accessible’ accreditation from The Money and Mental Health Policy Institute, after working with the charity to improve its services. This follows a comprehensive assessment by the charity of how accessible Lloyds Bank’s services are for customers with mental health problems, and in response to feedback, important changes have been made to banking services to make them easier for people with poor mental health to use.

One example of the approaches we take to support and include our diverse range of customers is the work we have done with the National Autistic Society. In ensuring our branches and services are accessible and easy to use for autistic people, we received the Autism Friendly Award in 2019. We are also part of the Valuable 500 movement which launched at Davos in 2019. As a result, we have committed to drive activity which supports, sustains and promotes an inclusive and diverse organisation for both customers and colleagues with visible and non-visible disabilities, including further increasing accessibility of financial services. We were also the first among our peers to offer British Sign Language video calls for deaf customers and Talking ATMs to provide assistance for people who cannot read the ATM screen.

Provisions on non-labour related rights issues
Business customers
We know that finance has an important role to play in influencing better social, human rights and environmental outcomes, and we take this into account in our investment, lending and service operations. We are signatories to the UN Principles for Responsible Investment (UNPRI) and the Equator Principles, a risk management framework adopted by financial institutions to determine, assess, and manage environmental and social risk in projects. We will not enter into credit or investment relationships with businesses believed to be in breach of any activities prohibited by international conventions supported by HM Government. These include the Oslo Convention on Cluster Munitions, the Ottawa Treaty on AntiPersonnel Landmines, the Chemical Weapons Convention and the Biological Weapons Convention.

We recognise that climate change is one of the biggest issues facing society. It also poses a threat to human rights particularly for people who are already vulnerable. We are committed to supporting our corporate customers and specify that they demonstrate that they are doing what they have committed to.

We act in accordance with the UN Global Compact which includes the principles that businesses should make sure that they are not complicit in human rights abuses and should uphold the elimination of all forms of forced and compulsory labour. As outlined in our Exclusion Policy, we do not invest in companies identified as violators of the UN Global Compact unless we believe we have sufficient leverage to influence their behaviour over a three-year period. If companies fail to comply with the UN Global Compact in this time period, they will be excluded from the investment universe.

Insurance and savings
As a long-standing signatory of the UNPRI, we are committed to being responsible investors and stewards of the assets we oversee on behalf of our pension customers. The majority of assets held for and managed on behalf of our customers are managed by third party managers who comply with our Stewardship Policy and are also signatories of the UNPRI. When selecting fund managers, we pay particular attention to their abilities to identify ESG risks and opportunities, including human rights abuses such as modern slavery, and to engage with companies they invest in on important issues. We hold them to account, insisting that they demonstrate that they are doing what they have committed to.

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Our Communities
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Our four independent charitable Foundations are fundamental to our vision of tackling social disadvantage, covering the whole of the UK and Channel Islands, partnering with local charities to help people overcome complex social issues, and rebuild their lives. Through receiving a share of the Group’s profits annually, the Foundations support thousands of charities, which also receive support through colleague volunteering and mentoring.

Additionally, our Lloyds Scholars programme provides less privileged students the financial support they need to study at university along with a package of support, including mentoring and internships. Our work on financial inclusion has also supported the growth and profile of Credit Unions.

We are strong advocates of the importance of mental health and of supporting the right to good mental health in the face of the pressures of modern society. In addition to the support provided to our workers, we also support a range of community-based initiatives. For example, we work extensively with Mental Health UK to help improve awareness and action across society. We are also funding a new UK-wide programme called Bloom to support young people’s mental health resilience. In recognition of this work at the national level, we were included in Fortune Magazine’s Change the World list 2019, ranking 31st internationally.

Provisions on non-labour related rights issues continued
**Governance**

**Our approach**
The Group’s approach to human rights is governed by the Responsible Business Committee, a committee of the Board of Lloyds Banking Group plc. The Committee’s role is to support the Board in overseeing the Group’s policies and performance as a responsible business. The Group’s day to day management of and engagement on modern slavery and human rights is guided by a Cross-Divisional Working Group, which, led by Responsible Business, has input from functions across the Group including HR, Sourcing, Retail, Commercial Banking, Fraud and Financial Crime as well as external human rights experts. This Working Group meets several times a year to assess the embedding of human rights within the Group’s operations.

Other relevant committees include the:
- Group People Committee which is responsible for the governance of the Group’s people and colleague policies, covering conduct, values and behaviours that can relate to human rights concerns, as well as related areas including remuneration. The Committee reports to the Chief Executive, by way of the Group Executive Committee; and
- Supplier Management Governance Committee which is responsible for overseeing supplier management capability and delivery and is made up of representatives from across the Group in order to embed strategy and best practice.

**Grievance mechanisms**
Colleagues and other stakeholders, including suppliers, can raise concerns through our grievance mechanisms, including the Speak Up line. Colleagues are also encouraged to speak to their line manager or to seek advice via our online “Colleague Connect” portal. Those who speak up are protected and supported through the Harassment and Grievance Resolution Policy. Concerns are taken seriously, the identity of the person raising the concern can remain confidential and no colleague will be discriminated against as a result of raising a genuine issue. The Speak Up Third-Party Policy has been designed to assist in managing any risk that Third-Party Suppliers’ employees are prevented from reporting any concerns about risk, malpractice or suspected wrongdoing. If any human rights violations are identified, we take appropriate action swiftly.

Queries or comments can be shared at any time by writing to:
Group Chief Executive’s Office
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