

LLOYDS  
BANKING  
GROUP



# CODE OF PERSONAL RESPONSIBILITY

The way we do business  
is based on our values



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# Code of Personal Responsibility

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## Foreword by Group Chief Executive António Horta-Osório

### Our vision is to be recognised as the best bank for customers.

We believe that we can make our greatest contribution to society by helping Britain prosper, and that means serving the financial needs of UK families, businesses and communities in a responsible and ethical way.

Our Codes of Responsibility help us do this. They set out our commitment, as individuals and as a business, to operating responsibly. They were developed with input from all parts of our business and external experts, and are reviewed annually to make sure they reflect our culture and the way we do business.

We expect all our colleagues and suppliers to work in line with the Codes. They set out what we expect of them and what they can expect from us. They set out their responsibilities, but also their rights. We encourage all colleagues, and stakeholders, to speak out if they see something that is not right.

We take non-compliance with the Codes very seriously. We acknowledge that we won't always be perfect and there will be occasions when we get it wrong. When this happens, we commit to putting things right as quickly and fairly as possible. I encourage you to challenge decisions or behaviours that aren't in line with the way we want to do business and manage risk.

We can only become the best bank for customers by building a great reputation founded on the highest standards of responsible behaviour. I am proud to work for a responsible business, using the Codes as a point of reference and a guide. I encourage you to do the same.

**António Horta-Osório**

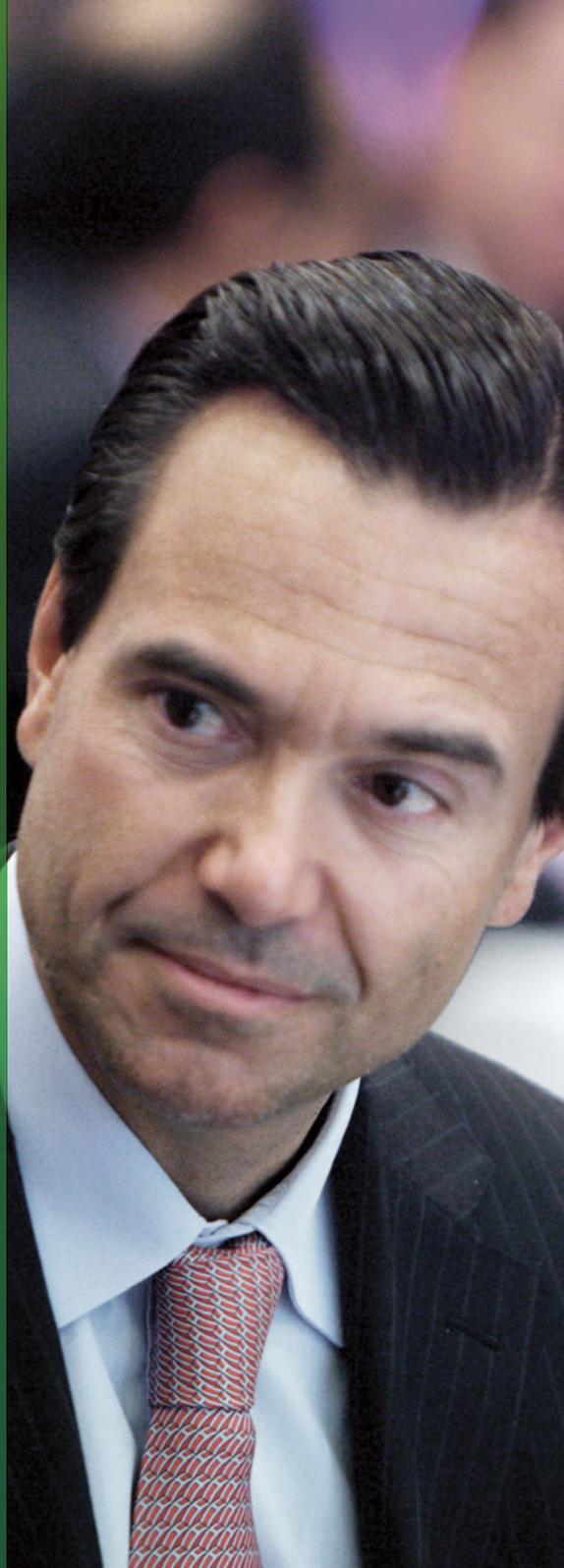
**"Our Codes of Responsibility provide clear guidelines for doing business fairly and responsibly, which is the best way to earn the trust of customers, colleagues, suppliers and other stakeholders. Trust is not a 'nice to have' - it provides the foundations for sustainable success."**

**Lord Blackwell**  
Chairman, Lloyds Banking Group



**“We can only become the best bank for customers by building a great reputation founded on the highest standards of responsible behaviour.”**

António Horta-Osório,  
Group Chief Executive



# Code of Personal Responsibility

## Introduction

Our Code of Personal Responsibility reflects the behaviours that we all want to be known for.

We recognise that it cannot cover every aspect of the way we should conduct ourselves and so, where relevant, we are expected to use our own personal judgement to make the right decision.

### Our Group Values

At the heart of our approach to doing business are our three group values of; **putting customers first, keeping it simple and making a difference together.** These Values guide the way we behave and give us standards to measure ourselves by. Each of us has a part to play in shaping our culture based on our Group Values and the Code of Personal Responsibility helps us to achieve this.

### Our pillars of responsible business

This Code and our Code of Business Responsibility support the Group Values. They also help us to work in line with our five pillars or responsible business:

1. We put customers at the heart of our business.
2. We aim to be a great company to work for.
3. We work responsibly with our external stakeholders.
4. We invest in communities to help them prosper and grow.
5. We work to continually reduce environmental impact.

**“As the Chair of the Responsible Business Committee, I fully support the Codes of Responsibility and congratulate the Bank on its progress in getting them embedded into the everyday work of our colleagues.”**

Sara Weller  
Independent Director, Lloyds Banking Group



## Our Code of Business Responsibility

This code explains how our Group does business and what others can expect from us. It explains the standards we set in our relationships with colleagues, external stakeholders, local communities and the environment. It also covers the issues associated with running an ethical and responsible business.

## Our Code of Supplier Responsibility

Our Code of Supplier Responsibility defines what we expect from our supply partners.

## Group Ethics and Responsible Business Policy

The Codes of Responsibility underpin the Group Ethics and Responsible Business Policy. This Policy defines how the Group manages ethical behaviour across the Group. It is critical to how we manage risk.

## Who this Code is for

The Code of Personal Responsibility and Code of Business Responsibility apply to all colleagues, contractors and temporary employees working for Lloyds Banking Group.

In some parts of the Group, we may refer to customers as clients, but for consistency our Codes refer to 'customers' throughout. We also use this term when referring to colleagues whose 'customers' may be others in the Group - for example, those working in IT or HR. At the same time, all of us, whether we work directly or indirectly with external customers, must consider their needs when performing our day-to-day roles.

## What we need to do

We should all read and understand both Codes of Responsibility. We are required to adhere to them and confirm we understand them every year. Doing this helps us all to live up to our Group Values, to work in line with our five pillars of responsible business, and to support our strategy to become the best bank for customers.

We are all required to adhere to our Group Ethics and Responsible Business Policy, Colleague Policy, Speak Up Policy and other Group Policies.

It's important that we all:

1. Take time to understand the Codes of Responsibility and how they apply to our roles.
2. Work in line with the Codes of Responsibility.
3. Challenge others who do not work in line with the Codes of Responsibility and if necessary escalate to a Line Manager, Senior Leader, HR Advice and Guidance or the Speak Up Line.
4. Feel empowered and confident about speaking out when we suspect that others are not working in line with the Codes of Responsibility.

Find out how to do this in the Help, advice and guidance section on page 14.

This Code of Personal Responsibility includes a Decision Guide to help us if a situation arises where we are uncertain of the most appropriate course of action. We are encouraged to use the Decision Guide on page 16 and share it with our teams to help us do the right thing.

## Frequently asked questions

**Q.** What are my responsibilities when it comes to adhering to the Codes of Responsibility?

You are required to review the Codes of Responsibility each year as part of the Mandatory Training curriculum. Once you have completed the training, it is expected that you understand your responsibilities under both Codes of Responsibility, and adhere to them every day.

**Q.** What will happen if I don't act in accordance with either of the Codes of Responsibility?

If you do not operate in accordance with the Codes of Responsibility, or the Personal Integrity policy, depending on the circumstances, you may be subject to disciplinary procedures.

## Our commitment to professional standards and professionalism in our industry

Lloyds Banking Group was an initial signatory to the Chartered Banker Professional Standards Board (CB:PSB). As part of our ongoing commitment to the highest standards of professionalism in banking we have subscribed to the CB:PSB Code of Professional Conduct and have embedded the requirements in both our Codes of Responsibility.

In addition, more of our colleagues have achieved the Chartered Banker Foundation Standard for Professional Bankers than in any other UK bank. The Foundation Standard consists of a set of indicators that are used to assess professional knowledge, skills, attitudes and behaviours.

## More information

Chartered Banker Professional Standards Board (CB:PSB)

[CB:PSB Code of Professional Conduct](#)

## How often do we update our Codes of Responsibility?

We review our Codes of Responsibility every year to ensure they are relevant.

Queries or comments can be shared at any time by writing to:

Responsible Business  
Group Corporate Affairs  
Lloyds Banking Group  
25 Gresham Street  
London EC2V 7HN



**Q.** Can I share the Codes of Responsibility with my stakeholders who do not work for Lloyds Banking Group?

Yes. You can share all our Codes with external stakeholders.

To access a copy of the Codes of Responsibility suitable for sharing with people outside the Group, please visit

[www.lloydsbankinggroup.com/RBDownloads](http://www.lloydsbankinggroup.com/RBDownloads)

# THE WAY WE DO BUSINESS



## Code of Personal Responsibility

**Our Group Values guide the way we behave and give us standards to measure ourselves against.**

Our values are:

**Putting customers first**

**Keeping it simple**

**Making a difference together**

This section explains how we can support these values in the way we behave at work and demonstrate our personal commitment to operating responsibly.



# Putting customers first

We think about customers first in everything we do, consistently striving to take actions to drive towards positive customer outcomes.

**Your commitment:**

## 1. Think about customers first in everything I do

I seek to design products, services or processes which put customers first and are readily understandable and I will challenge others who do not. I will always give easily understandable and accurate descriptions of these products, services or processes to my customers.

I comply with all current legal and regulatory requirements relevant to my role and strive to set a good example.

I take time to understand how I can make a positive difference to customers' lives through the products and services that the Group provides.

## 2. Understand and anticipate customers' needs

I serve my customers by listening to them, understanding and anticipating their needs and aspirations, delivering good customer service and good customer outcomes.

I treat customers fairly, and serve them with professionalism, respect, honesty and integrity.

I consider the risks and implications of my actions and advice and hold myself accountable for them and for the impact they may have on my customers, today and in the future.

## 3. Deliver on our promises to customers and each other

I deliver on my promises to my customers and when things go wrong, as they sometimes do, I take responsibility to put them right.

## 4. Take ownership to get things right for customers

I recognise my responsibility to deliver excellent service and positive outcomes to my customers and take ownership of any issues to ensure this is achieved.



# Keeping it simple

We make ourselves easy to do business with, communicating clearly and proactively seeking opportunities to deliver improvements for a simpler customer or colleague experience.

**Your commitment:**

## 1. Make ourselves easy to do business with

When designing processes or procedures, I will ensure that I make them as simple as possible to avoid unnecessary bureaucracy, thereby making it easier for my customers and my colleagues.

I ensure that any internal processes or procedures are designed in a way that makes it easy for different teams and divisions within the Group to work together.

Rather than designing a new process or procedure from scratch, where relevant I will follow best practice from other teams in the Group.

## 2. Communicate clearly and openly

I communicate with customers, colleagues and stakeholders in a way that is easy for them to understand, avoiding technical jargon and acronyms where possible.

## 3. Identify opportunities to simplify the things we do

I challenge others if I believe a process or procedure is unnecessarily complicated, and provide suggestions about how to improve it.

## 4. Work to get things right first time, every time

When things are not right first time, I work swiftly and simply to resolve the issues. When processes make it difficult to get it right first time, I will work to improve them.



# Making a difference together

We work together consistently in a collaborative way with colleagues and stakeholders to contribute positively to the customers and communities we serve.

## Your commitment:

### 1. Work together to deliver for customers

I listen to and work with my colleagues to ensure that I always put the customer first and I challenge those who do not.

I seek to develop my knowledge and skills that will enable me to enhance my contribution to the Group's performance.

### 2. Use feedback to improve what we do

I take the time to listen to my customers because this helps me understand how I can best deliver value for them and Lloyds Banking Group.

I support improvements in the Group's performance by sharing what I have learnt from past experience and best practice.

### 3. Treat people fairly and act responsibly at all times

I treat my colleagues as they would wish to be treated, recognising that we are all different.

I do not discriminate against any individual or group based on factors which are irrelevant to their ability to do their job.

I lead by example and act as a positive role model.

I treat individuals who raise an issue, report a breach or participate in an investigation with respect and good faith and in such a way that encourages colleagues to raise concerns.

I acknowledge and promote a healthy balance between work and home lives, and respect the commitments that others have outside the work environment.

I consider the risks and implications of my actions and advice. I hold myself accountable for them and for the impact they may have on my colleagues and communities.

I act in a professional, ethical and sensitive manner when dealing with confidential information to ensure that confidentiality is maintained. I always behave in an appropriate manner at work-related events held in or outside of office hours.

I always ensure that anything I say or write (via social media or any other channel) that can be associated with the Group is of an appropriate nature and does not cause embarrassment to, or harm the reputation of, the Group, my colleagues, customers or suppliers.

### More information†

More information can be found on the Social Media microsite.

### 4. Contribute positively to the communities I serve

I take time to listen to my customers and colleagues to understand more about how I can support and work with them to deliver value and contribute positively to the communities in which we live and work.

I seek to understand the environmental and community impacts associated with my role and take these into account when making decisions that have an impact on the communities in which we live and work.



# COMPLIANCE WITH THE CODE OF PERSONAL RESPONSIBILITY



Acting responsibly and ethically underpins everything we do. Everyone who works for the Group has a part to play in helping Britain prosper by meeting the financial needs of UK families, businesses and communities.

Our Codes outline what we expect from each other but we are also bound by law to act in a certain way. That means every colleague is required to demonstrate that they understand the requirements set out in the Code of Personal Responsibility by completing annual mandatory training.

## What this means for us

We provide training and support to help all colleagues but we recognise that in some circumstances, failure to comply with the Codes of Responsibility may be due to capability or a need for additional training or support. Where this is the case, the relevant Performance Management or Performance Improvement policy will be used to address concerns to ensure that colleagues are treated fairly and are given appropriate management support, coaching and training to improve their performance.

Failure to comply with the Codes of Responsibility, Colleague Policy, Speak Up Policy, or any of our other Group Policies, regulations or codes of conduct laid down by external authorities may result in severe consequences for Lloyds Banking Group and/or its employees. This may, therefore, constitute grounds for disciplinary action, in line with the Group's disciplinary policy. This action could potentially include dismissal or, in some circumstances, criminal prosecution.

All colleagues are required to review and comply with all of the Group Policies that are relevant their individual role.

The Group Policy Framework is published on Interchange.

 **Q. What will happen if I don't act in accordance with either of the Codes of Responsibility?**

If you do not operate in accordance with the Codes of Responsibility, or the Personal Integrity policy, depending on the circumstances, you may be subject to disciplinary procedures.

# HELP, ADVICE AND GUIDANCE



## Raising any concerns

We encourage you to Speak Up if you suspect anyone of inappropriate behaviour which is not in line with the standards set out in the Codes of Responsibility.

If you believe that you have witnessed behaviour that contravenes the standards of personal or business conduct outlined in the Codes, our Personal Integrity policy or our other Group Policies, you must discuss it. You can do this in three ways:

1. Your first port of call should be your Line Manager (who is the person you report to on a day-to-day basis).
2. If you are unable or unwilling to speak to your Line Manager, you should speak to another Senior Leader in your business area, such as your Line Manager's manager.
3. We encourage you to raise concerns directly with your line management. However, if this isn't possible, please do not keep it to yourself - contact the Speak Up Line, or raise your concerns through HR Advice and Guidance.

## Speak Up

The Speak Up Line\* provides colleagues with a confidential mechanism for expressing concerns about wrongdoing in the workplace that affects colleagues, customers or the Group. Please visit the Speak Up interchange site for more information.

Reports can be made by email, phone or online. Contact details can be found on Interchange.

Colleagues should read the guidance on when to call the Speak Up Line before making contact to ensure the report is made correctly. Mandatory training is available to help colleagues understand what support is available.

It is important that colleagues maintain contact with the Speak Up Line to ensure the correct information can be gathered to investigate the issue thoroughly.

## Non-retaliation

All concerns raised are taken seriously and the identity of colleagues who raise a concern will be kept confidential. No colleague will be discriminated against in any way as a result of raising an issue.

We provide ways to facilitate disclosure if a colleague is unable or unwilling to inform their line management and we will thoroughly investigate all genuine reports.

## Useful links†

[Group Policy Framework](#)

[Risk Management Framework](#)

[Colleague Policy](#)

Further information on underlying HR policies referenced within this Code, including Personal Integrity, Harassment, Grievance and Performance Improvement, can be accessed through the HR Advice and Guidance pages.

[Ethics and Responsible Business Policy](#)

[Speak Up Policy](#)

[Lloyds Banking Group Responsible Business pages](#)

\*The Speak Up Line is managed by Expolink who are completely independent of Lloyds Banking Group and are experienced in dealing with reports of wrongdoing. All reports are taken seriously and the identity of those who raise a concern will be kept confidential.

†For internal use only

# Decision Guide

## Helping you do the right thing

For the occasions in which an issue or situation arises and you are uncertain how to proceed, use the following guide to help you do the right thing, whilst remembering Lloyds Banking Group's basic expectations of your behaviour and conduct as detailed in the Codes of Responsibility.

All questions below should be taken into account - they are in no particular order.



Am I leading by example?

Am I sure my actions are legal and compliant? If not, can I seek guidance to help me make an informed decision?

Are my actions in line with the Codes of Responsibility and Group Policy guidelines?



Would I be happy to tell my colleagues and friends about my actions?

Would Lloyds Banking Group be comfortable if my actions were reported externally?



Are my actions consistent with our Group Values of putting customers first, keeping it simple and making a difference together?

Have I understood the risks and possible implications of what I am doing?



### NO/NOT SURE

If you answered 'No/Not Sure' to one or more of the questions: Contact your Line Manager or a responsible Senior Leader in your business area for further advice and guidance. If this is not possible, or has been unsuccessful, contact HR Advice and Guidance or the Speak Up Line.



### YES

If you answered 'Yes' to all of the above questions, this indicates that you are operating in line with the Codes. You can proceed as appropriate, subject to normal sign-off procedures, commercial and business-as-usual considerations.

# FREQUENTLY ASKED QUESTIONS

**Q.** A customer claims that Lloyds Banking Group has not acted in accordance with our Codes of Responsibility – what should I do?

First, make sure that you understand exactly which part of the Codes of Responsibility the customer is referring to, and then follow the procedure you use to deal with other types of complaint. It's also a good idea to speak to your Line Manager, who will engage the appropriate teams within the Group for support where necessary, for example Group Legal or Group Risk.

**Q.** I am unsure about the best way to resolve an issue and need to make a quick decision – what should I do?

If you want immediate guidance, refer to the Decision Guide in the Code of Personal Responsibility. This will prompt you to answer questions that will help you decide the best course of action. You should also speak to your Line Manager for further guidance.

**Q.** I have read the Codes of Responsibility and reviewed our Group Policies but I am still not sure on what the right course of action is – what should I do?

If you can't decide on the right course of action after referring to these documents, then you must speak to your Line Manager or another Senior Leader for guidance.

**Q.** I am concerned that a colleague is not acting in accordance with the Codes of Responsibility. I have informed my Line Manager, but I do not feel my concerns are being addressed?

If you do not believe your Line Manager is dealing with the situation appropriately, speak to another Senior Leader in your area. If you still feel uncomfortable with the way things are being handled, call HR Advice and Guidance or the Lloyds Banking Group Speak Up Line.

**Q.** I have dealt with a customer complaint by following regulatory procedures, but the customer has now contacted the Financial Ombudsman Service. Am I likely to be disciplined for not fulfilling the Code of Personal Responsibility commitment – Putting Customers First?

Situations will arise when you may feel that you are breaking the Codes of Responsibility because you are following a regulatory procedure which does not appear to be in line with our Group Value of 'Putting Customers First'. You must always follow regulatory procedures and if you feel this means that you are breaking the Codes of Responsibility, you should talk to your Line Manager for guidance.

**Q.** I do not deal directly with customers, so do the sections in the Codes of Responsibility that refer to customers still apply to me?

Yes. The Codes of Responsibility still apply to you.

In some parts of the Group, we may refer to customers as clients, but for consistency our Codes refer to 'customers' throughout. We also use this term when referring to colleagues whose 'customers' are others in our Group – for example, those working in IT or HR. At the same time, all of us, whether we work directly or indirectly with external customers, must consider their needs when performing our day-to-day roles.

**Q.** My Line Manager has asked me to do something that I do not feel comfortable about and that I think is not in line with the Codes of Responsibility – do I still have to do as my Line Manager has asked?

No. First you should speak to your Line Manager, in the first instance, to explain your concerns that this request will require you to break the Codes of Responsibility and to understand why the request has been made. If you are not happy with the explanation you get, you should speak to another Senior Leader in your area. If you still feel that your concerns are not being addressed and need further guidance, you should call HR Advice and Guidance or the Speak Up Line.

**Q.** I'm concerned that I've done something that is not in line with the Codes of Responsibility - what should I do?

You should speak to your Line Manager immediately to make sure that you understand any possible negative implications of your actions. If your Line Manager is not available, you should speak to another Senior Leader in your area. If you still have concerns after doing this, you should call HR Advice and Guidance or the Speak Up Line.

**Q.** I have an issue that I cannot talk to my Line Manager or a Senior Leader about so I think I need to call the Speak Up Line for help - is there anything that this Line cannot help me with?

Yes. If you are unable to talk to your Line Manager or a Senior Leader in your area, concerns over issues such as bullying, harassment, discrimination, career progression, workloads, pay awards and/or other terms and conditions of employment should be raised through the Group's HR Advice and Guidance Line. These issues will be dealt with under the appropriate HR policy and procedure, such as the Group's Grievance or Harassment policies.

More details about the type of concerns that should be made via the Speak Up Line are set out in the When should I call page on interchange. In the first instance, customer complaints should be remedied via the normal Complaints Governance process. It is important that you maintain contact with the Speak Up Line to ensure that issues that do not fall within the scope of the Speak Up Policy can be redirected to the appropriate area.

**Q.** I am a line manager and a member of my team has reported a possible breach of the Codes of Responsibility to me. What should I do?

We want Line Managers to encourage colleagues to Speak Up if they have any concern about a risk to our customers, the public or the Group. Helpful information on the action you should take can be found on the Speak Up advice to managers page. You can also approach your Line Manager or another Senior Leader in your area if you are still unsure of what action to take. Remember to reassure the colleague you will protect their identity, treat their concerns sensitively and in a confidential manner.

**Q.** I have spotted something in the Codes of Responsibility that I think should be changed - who should I contact?

Your feedback is welcome so please contact:

Responsible Business  
Group Corporate Affairs  
25 Gresham Street  
London EC2V 7HN

## Contact Us

Queries or comments can be shared at any time by writing to:

Responsible Business  
Group Corporate Affairs  
Lloyds Banking Group  
25 Gresham Street  
London EC2V 7HN

Available in alternative formats on request