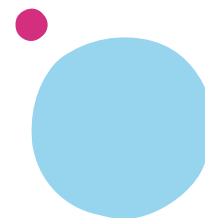




Whistleblowing Policy

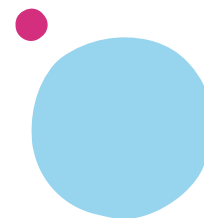
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Policy Details	
Policy name:	Whistleblowing Policy
Date approved:	March 2022
Version number:	6.1

What is the policy objective?

We care about our customers and our colleagues and strive to do the right thing. We do this by encouraging colleagues to report concerns of wrongdoing or inappropriate behaviour which could impact customers, colleagues, or TSB; knowing that their concerns will be investigated promptly and effectively without fear of reprisals for them.

We encourage all colleagues to have transparent and trusting relationships with their line managers as a first point of contact. If they are not comfortable reporting a concern to their line manager or a suitable alternative, the Whistleblowing process provides the opportunity for them to do so confidentially and, if they wish, anonymously.

Whistleblowing means raising a concern about wrongdoing in the workplace. A whistleblowing referral is an allegation of wrongdoing that impacts more than just the person raising the allegation, and that the person raising the concern is acting in the public interest, which includes the interests of TSB's customers and colleagues.

In addition, the person blowing the whistle must reasonably believe that the disclosure tends to show past, present, or likely future wrongdoing falling into one or more of the following categories:

- Criminal offences (such as theft, fraud, bribery, etc)
- Failure to comply with an obligation set out in law or by our regulators,
- Failure to comply with TSB's policies and standards,
- Miscarriages of justice,
- Endangering of someone's health and safety
- Damage to the environment,
- Covering up wrongdoing in the above categories.

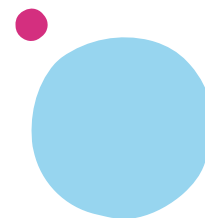
Colleagues do not need to provide proof before reporting their concern, a suspicion is adequate. Wrongdoing could involve a colleague, line manager, director, supplier, or other TSB contractor.

The identity of any whistleblower will not be revealed without their consent unless the law requires us to do so.

This Policy meets the expectations of the financial services regulator in relation to providing internal arrangements for handling colleagues' concerns. It also aligns with the Public Interest Disclosure Act 1998 (PIDA) which confirms that:

- Any disclosure made to the employer (be it a manager or director) will be protected if the whistleblower has a reasonable belief the information tends to show that malpractice has occurred, is occurring or is likely to occur
- Where a whistleblower is victimised, or dismissed in breach of the Act, they can bring a claim to an employment tribunal for compensation.

As TSB is a UK Senior Manager Certification Regime (SMCR) banking firm, we are required under Financial Conduct Authority (FCA) SYSC Chapter 18 rules to allocate the FCA-prescribed senior management responsibility for acting as the 'firm's whistleblowers' champion'. In addition, the FCA expect the whistleblowers' champion to be a non-executive director.



TSB have appointed a non-executive director, as per FCA requirements, as our Whistleblowers' Champion. This individual is responsible for ensuring and overseeing the integrity, independence and effectiveness of our Whistleblowing policy and procedures, including those intended to protect whistleblowers from being victimised because they have disclosed reportable concerns.

Who does this policy apply to?

This policy applies to all colleagues: this includes colleagues on a permanent, fixed, or temporary contract, all contractors and agency staff across all business areas and all interns or work experience persons.

We must ensure that our commitment to do the right thing for customers and colleagues, as a morally and socially responsible bank, is reflected across all aspects of TSB and every single one of our colleagues thinks about what wrongdoing in the workplace is and how they should report it.

It is the responsibility of all colleagues to report any concerns they have about behaviours or activities which cause them concern and they should be encouraged to do so; either via their line managers or via TSB's Speak-up Team

Waivers

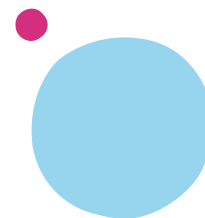
Waivers to this Policy are not permitted.

Breaches

Any Breaches identified should be notified to Enterprise Assurance & other appropriate areas using the process detailed in the Incident Guidance.

What must we do?	How do we check we are doing that? (i.e., Monitoring of the control activity)
TSB must appoint a non-executive director as "Whistleblowers' Champion", with the responsibility for ensuring and overseeing the integrity, independence and effectiveness of the firm's policies and procedures on whistleblowing.	<i>A Whistleblowers' Champion is appointed and kept informed of whistleblowing activity, as per FCA expectations.</i>
We must make it easy for concerns of wrongdoing to be raised in the strictest confidence	<i>In the first instance, colleagues are encouraged to speak with their line manager to raise concerns. However, if that is not appropriate, TSB provides different ways for concerns of wrongdoing to be raised:</i> <ul style="list-style-type: none">• Telephone: 0800 151 0050 (+44 800 151 0050)• Email: whistleblowing@tsb.co.uk• Post: TSB Investigations Team, Henry Duncan House, 120 George Street, Edinburgh EH2 4LH <i>In addition, there are other options available to raise concerns if you do not wish to raise them with direct with TSB.</i>

	<p>Concerns can be raised via the whistleblowing charity Protect who can raise concerns on the whistleblower's behalf. Protect can be contacted on:</p> <ul style="list-style-type: none"> • Telephone: 0800 221 8703, • Email: advice60@protect-advice.org.uk, • Website: Advice Line Protect - Speak up stop harm (protect-advice.org.uk). <p>Concerns can be raised directly to the FCA or PRA.</p> <ul style="list-style-type: none"> • FCA: <ul style="list-style-type: none"> ○ Telephone: 0207 066 9200, ○ Email: whistle@fca.co.uk, ○ Website: Whistleblowing FCA. • PRA: <ul style="list-style-type: none"> ○ Telephone: 0203 461 8703, ○ Email: whistleblowing@bankofengland.co.uk, ○ Website: Whistleblowing and the Prudential Regulation Authority Bank of England. <p>Colleagues may also raise concerns with their Union or legal representatives.</p>
We must ensure <i>colleagues</i> understand what they can and can't raise via Whistleblowing	<ul style="list-style-type: none"> • Core learning for all colleagues in TSB to provide training on the type of concerns that can be raised, • Posters throughout the business highlighting concerns that can be raised, along with contact details. • Guidance in the "Whistleblowing Guidance for Colleagues" document which can be found on the Speak up and be heard - Whistleblowing (sharepoint.com) page
We must ensure that line managers understand the support available to them and their responsibilities	<ul style="list-style-type: none"> • Line managers must encourage colleagues to report any wrongdoing either to themselves or by contacting the whistleblowing hotlines. • Line managers are to ensure that there are no obstructions preventing colleagues from raising concerns. • Further guidance is available for line managers on the Speak up and be heard - Whistleblowing (sharepoint.com) page
We must ensure that colleagues raising concerns do not suffer any detrimental impact from raising those concerns or suffer any form of victimisation.	<ul style="list-style-type: none"> • Colleagues who feel that they have suffered any detrimental impact, or are being victimised, following a whistleblowing disclosure must contact TSB's Speak-up Team immediately, or any other contact option as detailed within this policy. • Guidance on what may constitute detrimental impact or victimisation is available within the "Guidance to Colleagues" document which can be found on the Speak up and be heard - Whistleblowing (sharepoint.com) page
All Whistleblowing concerns are to be thoroughly investigated and reported through the Fraud Investigations and Intelligence Team, who operate TSB's Whistleblowing hotlines	<ul style="list-style-type: none"> • The Fraud Investigations and Intelligence team will maintain accurate and confidential recording keeping of all whistleblowing referrals, • Claims of wrongdoing will be thoroughly investigated, with a comprehensive investigation report produced detailing conclusions and any actions taken, • All investigation reports are reviewed and signed off by the nominated whistleblowing contact and the manager or senior manager of the Fraud Investigations and Intelligence team.



	<ul style="list-style-type: none">• <i>Updates will be provided to the whistleblower on the progress of the investigation, including the outcome of the investigation where appropriate.</i>
Regular reporting of trends and outcomes to TSB's Whistleblowers' Champion, and TSB's Board	<ul style="list-style-type: none">• <i>Regular meetings are held with TSB's appointed Whistleblowers' Champion detailing trends, outcomes, and any actions to make improvements in how concerns are raised and investigated, and any additional training requirements for colleagues and/or line managers,</i>• <i>An annual whistleblowing report is presented to TSB's Board updating on activity carried out during the year.</i>

Where to find out how to meet the requirements?

The following guidance documents can be accessed via the Speak up and be heard - Whistleblowing (sharepoint.com) page:

Guidance for Colleagues
Guidance for Line Managers

In addition, our FCA requirements are detailed here: [SYSC 18 - FCA Handbook](#)

Or you can contact TSB's Speak-up Team for any additional help or support.