

Speak-up Guidance for Reporters

Our Commitment

We are committed to maintaining an environment in which workers feel safe and supported in speaking up to raise concerns. We have established channels and processes that you can use to report in confidence illegal or unethical conduct that may harm the Company and the public interest. You should speak up if you have a genuine belief that potential or actual wrongdoing has occurred, is occurring or will occur in the workplace.

You may use these channels to raise concerns about breaches involving:

- Criminal activity
- Miscarriage of justice
- Oppressive, discriminatory, or negligent behaviour by a public body or unlawful or improper use of public funds
- Financial malpractice or impropriety or fraud
- Breaches of EU or national legal or regulatory requirements in the following areas:
 - Financial services, products, and markets
 - Prevention of money laundering and terrorist financing
 - Protection of the environment
 - Danger to health and safety
 - Consumer protection
 - Protection of privacy and personal data, security of network and information systems
- Securities or commodities fraud, insider dealing and wholesale or consumer/ customer market conduct rule breaches.
- Breaches affecting the EU’s financial interests.
- Breaches relating to the internal market, including breaches of EU competition and State aid rules, and breaches of national corporate tax rules.
- Attempts to conceal or destroy evidence of any of the above

Note: Issues related to interpersonal conflict, or your personal employment should be reported to Human Resources through the grievance process.

You may report your concerns via one of the following confidential channels:

	<p>Report online via the Ethics Line. Available 24/7, the Ethics Line is a confidential resource provided by an independent third party.</p>			
	<p>Ireland 1800851345 UK 0800 046 5394 Germany 0800 1820176 Lithuania 880031729 Luxembourg 800 24 965</p>	<p>Norway 800 62 156 Poland 800005097 Spain 900876077 Sweden 010-102 04 34</p>		

If you prefer, you may [contact](#) the Global Ethics Office to request an in-person meeting to share your concern. The Global Ethics Office will facilitate a meeting with an appropriate internal party.

Anonymous reports will be acted upon to the extent permitted by law.



This process complements our internal policies which also include other [internal and external escalation and reporting routines](#) which may also be appropriate under the circumstances (notably in financial services and money laundering, and terrorist financing).

Before deciding to report, you may wish to provide information or seek guidance from leaders in Risk Management and Compliance, Human Resources, or the Law Division, depending on the nature of your concern. Such advice will be kept confidential to the fullest extent possible.

We will follow-up on reports received through internal channels as follows:

- We will promptly acknowledge receipt of your report, appoint an impartial person to investigate and then provide feedback within 3 months from acknowledgment of receipt.
- We will not reveal the reporting person's identity, except to those authorized to receive or follow up on reports.
- We will ensure compliance with EU data protection legislation.
- We will keep records of every oral or written report received.

Any information provided internally shall be dealt with in compliance with all laws and regulations governing the protection of personal data.

You may also choose to report externally if you are not comfortable raising your concern internally.

We encourage you first to use our whistleblowing process. However, if you don't feel able to do so, you may choose to report externally to one of the following entities by email, telephone or in writing. Please go to the entity's website (or to comparable entities websites in other EU countries) for the most up to date information.

Central Bank of Ireland

Email: confidential@centralbank.ie

Phone: 1890 130014

Mail: Protected Disclosures Desk

P.O. Box 11517

Spencer Dock

Dublin 1

D01 W920

Depending on the nature of your concern, it may be appropriate to report to a regulator other than the Central Bank of Ireland. Contact information for prescribed persons can be found here: [Ireland](#), [UK](#), [Germany](#), [Lithuania](#), [Luxembourg](#), [Norway](#), [Poland](#), [Spain](#), and [Sweden](#).

Commitment to Non-retaliation

We do not tolerate retaliation against any person reporting in good faith based on a reasonable belief that a breach has occurred or is very likely to occur. Any person who believes they have experienced retaliation should immediately report this to the Global Ethics Office or Human Resources. Such reports will be investigated without delay.