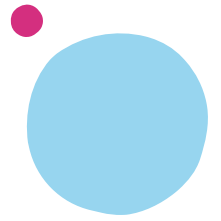




TSB Summary Statement of Speak Up and Be Heard - Whistleblowing Policies and Procedures

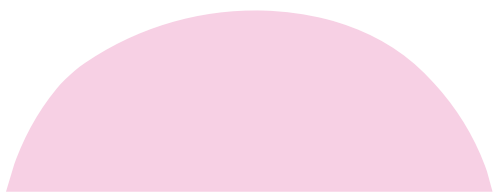
Approval Date: 26 November 2024

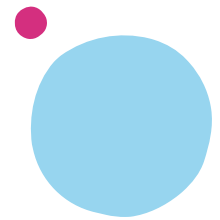
Version number: 8.0



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Policy Details

| | |
|---------------------------------|---|
| Policy name: | TSB Summary Statement of Speak Up and Be Heard - Whistleblowing Policy and Procedures |
| Date approved: | 26/11/2024 |
| Version number: | 8.0 |
| Document Classification: | Public |

What is the policy objective?

Purpose

This document provides a summary of TSB's Speak Up and Be Heard – Whistleblowing framework, intended to support external parties undertaking due diligence on TSB.

Summary of TSB's Whistleblowing Framework

Legal & Regulatory Structure

TSB Bank PLC is a wholly owned subsidiary of Banco de Sabadell, S.A.

TSB Speak Up and Be Heard Whistleblowing framework is designed to comply with:

- Public Interest Disclosure Act 1998 (PIDA).
- Financial Conduct Authority (FCA) SYSC Chapter 18 rules on Whistleblowing.

Who does the policy apply to?

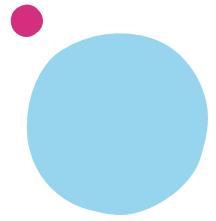
TSB Speak Up and Be Heard - Whistleblowing Policy applies to all TSB colleagues. This includes:

- Those on a permanent, fixed, or temporary contract.
- All contractors, consultants, and agency staff across all business areas.
- Those who previously worked for TSB.

TSB's whistleblowing programme

TSB is committed to:

- Creating an inclusive culture where colleagues are encouraged to report concerns of wrongdoing or inappropriate behaviour which could impact customers, colleagues, third parties or TSB;
- Treating all disclosures consistently and fairly;
- Not discriminating against any party involved in an allegation;
- Taking all reasonable steps to maintain the confidentiality and anonymity of the whistleblower when dealing with their disclosure and at all stages of an investigation up to conclusion where it's requested. If the whistleblower's identity is required to be revealed, prior consent will be sought (unless otherwise required by law); and
- Zero tolerance for victimisation of whistleblowers.



To comply with PIDA and FCA's SYSC Chapter 18, TSB whistleblowing programme contains:

- Speak Up and Be Heard Whistleblowing Policy (the Policy).
- A range of confidential, secure, and effective channels for reporting and investigating concerns.
- Governance framework, including:
 - A non-executive director appointed as the Whistleblower's Champion to oversee the integrity, independence, and effectiveness of the Policy.
 - A report to the Board and the Whistleblower's Champion produced at least annually.
 - TSB Board responsibility for the approval of the Policy.
- Measures to make colleagues aware of the Speak Up and Be Heard Whistleblowing Policy (including mandatory, annual training and employment contract terms) and their rights under PIDA.
- Documented process for fair, professional, and confidential investigations of whistleblowing disclosures.
- Culture where colleagues raising concerns do not suffer detrimental impact or victimisation as a result of making a protected disclosure/report is established. TSB considers any retaliation against those who raise concerns under protected disclosure as a potential disciplinary matter.

Reporting concerns

TSB's internal reporting channels are available to permanent and temporary employees (including contractors) whose disclosure are protected under PIDA 1998 on TSB's internal SharePoint.

Third parties who want to raise concerns in relation to TSB, can report them to:

- TSB internally:
 - Customers who have a question or complaint regarding products or services, can contact TSB via ways outlined on [Help and Support | Help and Support | TSB Bank](#)
 - Suppliers can raise concerns directly with their TSB Category Managers which will be escalated to senior management if required.

- TSB's regulators:

FCA:

- 0207 066 9200,
- whistle@fca.org.uk,
- [Whistleblowing | FCA](#).

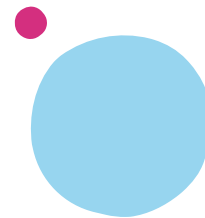
PRA:

- 0203 461 8703,
- whistleblowing@bankofengland.co.uk,
- [Whistleblowing and the Prudential Regulation Authority | Bank of England](#).

Compliance Monitoring

TSB's compliance with Speak Up and Be Heard – Whistleblowing Policy is monitored through:

- Control testing;
- Close and continuous oversight and assurance;
- Audit and the reporting of management information; and
- Oversight by senior governance committees.



TSB appointed a Non-Executive Director as a Whistleblower's champion to oversee the integrity, independence and effectiveness of TSB's Speak Up and Be Heard Whistleblowing Policy and procedures.

| Version Control Details | | |
|-------------------------|------------------|--|
| Version Number: | Effective Date: | Comments: |
| 6.1 | March 2022 | |
| 7.0 | 23 November 2023 | Updated to align to a new internal policy |
| 8.0 | 01/12/2024 | Annual refresh. Reporting contact for external parties added |