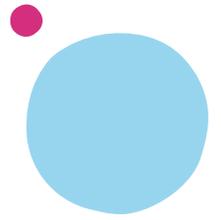




TSB Summary Statement of Speak Up and Be Heard - Whistleblowing Policies and Procedures

Approval Date: 22 November 2023

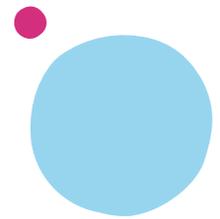
Version number: 7.0



Contents

Policy Details	3
What is the policy objective?	3
Summary of TSB's Whistleblowing Framework	3
Version Control Details	4





Policy Details

Policy name:	TSB Summary Statement of Speak Up and Be Heard - Whistleblowing Policy and Procedures
Date approved:	22/11/2023
Version number:	7.0

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?

The Policy applies to all TSB colleagues. This includes:

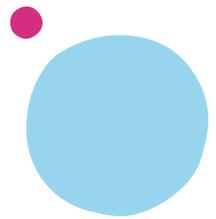
- those on a permanent, fixed, or temporary contract.
- all contractors, consultants, and agency staff across all business areas.

TSB's whistleblowing programme

To comply with PIDA and FCA's SYSC Chapter 18, TSB Speak Up and Be Heard Whistleblowing Policy requires that:

- There is a governance framework around the Speak Up and Be Heard Whistleblowing Policy.
- Appropriate measures are taken to make colleagues aware of the Speak Up and Be Heard Whistleblowing Policy and procedures (including mandatory, annual training).
- A range of confidential, secure and effective channels for reporting and investigating concerns are established, implemented and maintained (internal and external channels are available to colleagues on TSB internal SharePoint).
- Culture where colleagues raising concerns do not suffer detrimental impact or victimisation as a result of making a protected disclosure/report is established.
- A report to the Board and the Whistleblower's champion is produced at least annually.

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;
- Taking all reasonable steps to maintain the confidentiality and anonymity of the whistleblower 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.

Compliance Monitoring

TSB's compliance with Speak Up and Be Heard – Whistleblowing Policy is monitored through several methods, including: control testing; close and continuous oversight and assurance; audit and the reporting of management information to 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	