



**Bank of Ireland Group
Code of Supplier
Responsibility**

November 2024



Foreword

I am pleased to endorse the updated Bank of Ireland Group Code of Supplier Responsibility.

At Bank of Ireland Group (“the Group”), we have a clearly articulated purpose to help customers, colleagues, shareholders, and communities to thrive. Our strategy is to deliver stronger relationships with customers and colleagues, a simpler and more efficient business, and a Bank with sustainability at its core. Our values are central to how we work to deliver this strategy. At Bank of Ireland, we are customer first, better together, we take ownership and are decisive.

We are committed to applying the highest ethical conduct and integrity standards in our business activities and have embedded sustainability as one of the Group’s three core strategic pillars under ‘Sustainable Company’ alongside the pillars of Stronger Relationships and Simpler Business.

Key to this is ensuring we work with suppliers that share our purpose and values and ensuring that all our suppliers that provide goods or services to or on behalf of the Group operate in an ethical, sustainable, inclusive, and accessible manner, including relating to working conditions, equal treatment and opportunities for all and other work-related rights.

The Group Code of Supplier Responsibility (“the Code”) sets out the key social, ethical and sustainability standards that we want our suppliers to achieve, aligned with our Sustainability Strategy, Group Code of Conduct and Group Third Party Policies. The Code highlights our key priorities, including ensuring we foster a diverse and inclusive supply chain through to ensuring individuals across our supply base work in a manner which is both safe and healthy. We are committed to managing our impact on the environment on a sustainable basis and to take the necessary steps to source goods and services responsibly across our supply chain.

Please share this Code with your employees that work on Bank of Ireland Group activity so they can understand our values and aspirations. Together we can support positive economic, environmental, social, and sustainable outcomes that and contribute to our mutual success and the customer and communities we serve.

Ciaran Coyle

Group Chief Operating Officer

Bank of Ireland Group

Our Organisation

Bank of Ireland Group (“the Group”) is one of the largest financial services companies in Ireland providing a broad range of banking and other financial services to retail and business customers in Ireland, the United Kingdom and select international markets. These services include current account and deposit services, overdraft facilities, term loans, mortgages, business and corporate lending, international asset financing, leasing, instalment credit, invoice discounting, foreign exchange facilities, interest and exchange rate hedging investments, life assurance, motor finance, pension, and protection products. All these services are provided by Bank of Ireland Group in Ireland with selected services being offered in the United Kingdom and internationally.

We are currently transacting with approximately 1,800 suppliers predominantly in Ireland and the United Kingdom. Suppliers are categorised according to the nature, scale, and criticality of services they provide to the Group.

Our strategy is built on three strategic pillars:

- Stronger relationships – establish deeper, mutually value-adding customer relationships and easier, joined-up services and products;
- Simpler business – simplify the day-to-day activities and interactions of our customers and colleagues;
- Sustainable company – deliver impact on the most critical challenges facing our customers, colleagues, and society.

You can find out more about Bank of Ireland Group’s trading divisions in all jurisdictions, and a full list of its products and services at [Bank of Ireland Begin](#).

Group Commitments – Memberships & Associations

The Group has committed to aligning with a number of mandatory and voluntary frameworks summarised below:

Mandatory Commitments	Voluntary Commitments
<ul style="list-style-type: none"> • EU Non Financial Reporting Directive (NFRD). • Corporate Sustainability Reporting Directive (CSRD) • The Taskforce on Climate Related Financial Disclosures (TCFD). • EU Taxonomy. • EBA Sustainable Finance Pillar 3 ESG Disclosures. • EU Sustainable Finance Disclosure Regulation (SFDR), applicable to Group entities New Ireland Assurance Company plc, Davy, and Bank of Ireland Investment Markets. • Regulatory expectations on climate change as set out by the European Central Bank (ECB), and the Prudential Regulatory Authority (PRA) for BoI UK plc. 	<ul style="list-style-type: none"> • UNEP FI Principles for Responsible Banking (UNPRB). • UN Principles for Responsible Investment (UNPRI). • UN Principles for Responsible Banking ‘Commitment to Financial Health and Inclusion.’ • CDP (formerly The Carbon Disclosure Project). • UN Sustainable Development Goals (SDGs). • Science Based Targets Initiatives (SBTi). • Partnership for Carbon Accounting Financials (PCAF). • Taskforce for Nature-related Financial Disclosures (TNFD) Forum • Partnership for Biodiversity Accounting Financials (PBAF) • All-Ireland Pollinator Plan • UNPRB Nature Target-setting Working Group • CirculÉire • Business in the Community Ireland’s Low Carbon Pledge and Elevate Pledge. • ISO 50001 Energy Management System and ISO 14001 Environmental Management System (EMS). • Taskforce for Nature related Financial Disclosures (TNFD) Forum.
Group Voluntary Associations & Memberships	
<ul style="list-style-type: none"> • Business in the Community Ireland’s Business Working Responsibly Mark • Central Bank of Ireland Climate Forum • Banking & Payments Federation Ireland • Sustainable Finance Ireland • Irish Banking Culture Board (IBCB) • IBEC • UK Finance 	

Our approach to responsible and sustainable business

Conducting our business in a responsible and sustainable way is fundamental to achieving our purpose of enabling our customers, colleagues, shareholders, and communities to thrive.

Our sustainability strategy and approach centres on three pillars:

- **Supporting the green transition** - We are committed to working with our customers, colleagues, and communities to support their transition to a resilient, net zero economy by 2050 in line with government ambitions and actions.
- **Enhancing financial wellbeing** - We are committed to empowering people with the knowledge and skills needed to make the most of their finances while striving to leave no one behind on the journey to financial health.
- **Enabling our colleagues to thrive** - We are committed to create an inclusive and supportive workplace for all our colleagues, enabling them to develop brilliant careers, supporting them during key life moments that matter and providing a safe and fair place to work that welcomes everybody.

We have identified key foundational topics which guide our commitment to being a sustainable business. These topics include Health & Safety, Sourcing Responsibly, Human Rights, business ethics and culture.

Our Policies & Procedures

Group Code of Conduct

The Group's Code of Conduct provides guidance on the expectations for all colleagues in pursuit of upholding our values and culture and outlines various expected behaviours. By acting on the code we aim to create an efficient, customer-focused, and responsible workplace with a mature culture that fosters growth for our customers, colleagues, and society.

The Group Code of Conduct sets out the behavioural standards which underpin our Group values of:

- **Customer First** - Everything we do is for our customers. Our business is designed around them. We are empathetic, we listen, and we work hard to meet their needs, connecting with them to make them feel valued. Their success is our success.
- **Better Together** - We achieve more when we work together. We collaborate, we share ideas, we challenge thinking, and we learn from and care for one another. We value the real power that lies in our capacity to harness our diverse skills and experiences for the good of the whole.
- **Be Decisive** - We move quickly and make things simple to deliver positive outcomes for customers and for us. We exercise good judgement, avoid complexity, and work smarter together to get to the solution quickly.
- **Take Ownership** - We are trusted and supported to take ownership for our actions, and to deliver on our commitments. We accept responsibility for our decisions and actions.

Group Financial Crime Compliance Statement

This compliance statement sets out our commitment to protect our customers, colleagues, and communities from the adverse effects of financial crime, and support government and regulators in effective financial crime prevention. It comprises our Anti-Money Laundering Compliance Policy Statement, Sanctions Compliance Statement and Anti-Bribery and Corruption Compliance Statement including the requirement to ensure that appropriate due diligence and controls are applied to any third-party Bank of Ireland engages, to ensure that they comply with all applicable anti-bribery legislation and regulation.

The Group Code of Conduct and Group Financial Crime Compliance Statement are published on the [Reports and Policies](#) section of the Group website.

Group Market Integrity Policy

This Policy sets out how we identify and manage conflicts of interest which is fundamental to the conduct of our business, our relationships with our customers, and the markets in which we operate. We must act honestly and with integrity, including operating without bias and preventing, or identifying and appropriately managing, conflicts of interest. Where a conflict arises and we are unable to prevent or avoid the situation, appropriate mitigations must be in place to manage the conflict. Even if there is no evidence of improper action, a conflict of interest can create an appearance of impropriety that undermines confidence in the Group.

To achieve our objectives, it is crucial that we act ethically and responsibly, and that this informs the way in which we source goods and services from our Suppliers. We are committed to introducing responsible and sustainable business practices that make it easier for our suppliers to do business with us.

This Code of Supplier Responsibility is for all suppliers to the Group. It defines what we expect from our suppliers in terms of responsible business practice and behaviour and aligns with the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. It applies together with our Group Third-Party Policies document and our membership of the Financial Supplier Qualification System (FSQS), our on-line portal for you to submit information and compliance data about your organisation. The Code and Group Third-Party Policies are maintained by our first line Third Party Risk Management team in conjunction with relevant Group Stakeholders.

You can access our Third-Party Policies and read more about FSQS system in the 'Working with Suppliers' section of www.bankofireland.com

You can also read more about Bank of Ireland Group and our approach to responsible and sustainable business on our website www.bankofireland.com.

Scope

All Bank of Ireland Group suppliers are required to comply with this Code, which is in addition to the requirement, in your supplier agreement(s) with the Group, to comply with applicable laws, regulatory requirements and applicable Group policies.

We define a supplier as any third-party organisation that provides goods or services to or on behalf of the Group. This includes suppliers that are providing services to or on behalf of the Group, suppliers' officers, and employees, and third parties sub-contracted by a supplier. This definition does not include individual contractors, agents, or intermediaries.

What you need to do

As a supplier to Bank of Ireland you are **expected** to:

- confirm your agreement to comply with this Code and Group Third Party Policies (and any future revisions) when you complete our Financial Services Qualification System (FSQS) process.
- explain the principles of this Code with your officers, employees, and sub-contractors that support Bank of Ireland or work on our projects.
- ensure fair and honest business with all your stakeholders, including officers, employees, sub-contractors and other third parties.
- understand the ethical, sustainability, accessibility, and inclusivity practices of your suppliers to enhance effective risk management in these areas.
- inform us if anything changes that may impact your ability to comply with the Code.
- speak up if you are concerned about any actions or decisions that contravene the standards set out in the Code.

How to Speak Up

The Bank is committed to conducting our business with honesty and integrity and we expect everyone working on behalf of the Bank to maintain these high standards.

The Group Speak Up Policy explains what a Speak Up concern is and makes it easier for colleagues, including suppliers, to safely and confidentially raise a Speak Up concern about suspected or actual wrongdoing in a work-related context, without fear of penalisation.

The Group Speak Up Policy is available via [Corporate Governance - Bank of Ireland Group](#) Website and contains all the relevant contact details and information on resources/supports to help you raise a Speak Up concern.

What we expect of you

Our expectations on our suppliers are grouped into five key areas:

- Human Rights
- Health and Safety
- Supply Chain
- Accessibility, Inclusion and Diversity
- Responsible and Sustainable Business

In each case, we describe our minimum expectations using the term **'we expect.'**

In some areas, we aspire to meet certain standards, and in these cases, we use the term **'we encourage.'**

These expectations complement our suite of Group Policies, some of which you may be asked to comply with depending on the services you provide to us. Your supplier contract(s) or agreement(s) with the Group may set out more explicit requirements in these areas which you are required to comply with in addition to the above minimum expectations.

Human Rights

We expect all our suppliers to respect human rights, both of your own workforce but also those in your supply chain. The Group Modern Slavery & Human Trafficking Statement reflects our position.

We **expect** you to:

- respect the human rights of your employees and to comply with all relevant legislation, regulations and directives in the countries and communities in which you operate including compliance with the UK Modern Slavery Act (where applicable).
- prohibit forced labour (slavery) and human trafficking in your supply chain and give all employees the right and ability to leave employment with you if they choose.
- prohibit child labour. Child labour is defined by the International Labour organisation ILO) as *"work that deprives children of their childhood, their potential, and their dignity and that is harmful to the physical and mental development."* It includes work that is mentally, physically, socially, or morally dangerous and harmful to children; and interferes with their schooling.
- ensure that wages meet legally required minimum standards without unauthorised deductions.
- allow your employees to legally organise and join associations (such as labour unions).
- provide uniformly applied expectation of behaviour of all employees, to protect dignity and respect in the workplace.
- provide clear and uniformly applied disciplinary and grievance procedures including prohibiting mental, physical, or verbal abuse.
- ensure working hours are in accordance with local regulation and industry practice and voluntary overtime is at a manageable level.
- ensure there are no negative consequences resulting from employees speaking up about a workplace concern.
- Ensure ethical, transparent, and sustainable use of Artificial Intelligence (AI) that does not impact negatively on human rights.



Health and Safety

We expect all our suppliers to operate in a manner which is safe.

We **expect** you to:

- identify hazards and document risk assessments for all your work activities/properties and revise these risk assessments at least annually or sooner where work practices change.
- have in your employment a competent Health and Safety Advisor or have access to same on a consultancy basis.
- provide a safe work environment abiding by local laws and regulations, respecting the health and wellbeing of your employees and any subcontractors.
- have a written Health and Safety Policy and/or Safety Statement.
- effectively communicate risk assessments and your Health and Safety Policy/ Safety Statement to your staff and provide any additional training as identified by your risk assessment process.



We **encourage** you to:

- be certified (or working towards certification) to ISO 45001, the internationally recognised Occupational Health and Safety Management Standard.



Supply Chain

We expect all our suppliers to manage their own suppliers in a responsible and sustainable manner.

We **expect** you to:

- manage your own suppliers appropriately to mitigate supply chain risks, and to ensure that they are aware of, and compliant with, the aims of this Code.
- have reasonable payment policies covering your own suppliers aligned to BOI commitment on prompt payment of invoices.
- have your own Supplier Policies and Code of Conduct that your suppliers are required to comply with.
- consider the ethical, accessibility, inclusivity, and sustainability-related practices of your supply chain and proactively work with suppliers who represent the highest risk on such issues to drive effective risk management.



We **encourage** you to:

- strive to have a supply base that is inclusive and diverse (including for example supporting SMEs, Social Enterprises as well as under-represented groups).



Accessibility, Inclusion and Diversity

We expect all our suppliers to understand our commitments in relation to accessibility, inclusion, and diversity.

We **expect** you to:

- treat all employees fairly and not discriminate against any group in your employment practices.
- proactively foster an inclusive working environment that promotes accessibility, gender equality and dignity at work, and the development of a diverse workforce at all levels of the organisation, including diversity of gender, age, disability, sexual orientation, ethnicity, and nationality.
- adhere to relevant legislation, standards, guidance, and regulations related to Accessibility, including but not limited to Disability Act 2005 (Ireland), Equality Act 2010 (UK) and the European Accessibility Act 2019 (effective 28th June 2025).



We **encourage** you to:

- have a documented Inclusion and Diversity Policy or Statement.
- have governance and accountability in place to oversee the implementation of your Policy.
- provide inclusion and diversity training within your organisation.
- promote wellbeing initiatives in the workplace.
- be accredited (or work towards accreditation) as a disability-smart organisation.



Responsible and Sustainable Business

We expect all our suppliers to be accountable and act with integrity in all dealings.

We **expect** you to:

- provide your staff with comprehensive Responsible Business Strategy policies together with associated guidance and training to enable them to manage any conflicts (or potential conflicts) of interest. These must reference both personal conflicts and business conflicts.
- have your own Code of Business Responsibility, or a similar policy or statement that covers adherence to local laws; bribery and corruption; and business integrity (including improper payments, conflicts of interest, fraud, competition, gifts and hospitality, and brand and intellectual property protection).
- have a written Environmental Sustainability Policy which is appropriate and relevant for your operations, and which seeks to minimise the impacts of your operations on the environment.
- actively engage in pollution prevention measures through the ongoing identification, control and reduction of those significant environmental impacts associated with your activities.
- comply with all relevant environmental legislation and any applicable regulatory directives and all relevant codes of practice with respect to energy management.
- demonstrate a proven record in Environmental, and/or Energy Management for your operation.





We **encourage** you to:

- be certified (or work towards certification) to a formal Environmental Management System Standard, such as ISO 14001.
- be certified (or work towards certification) to a formal Energy Management System Standard, such as ISO 50001 where relevant.

What we will do – Our Commitment to You

We commit to:

- Supporting an ethical, inclusive, and accessible supply chain
- Supporting opportunities to reduce adverse environmental and climate impacts.
- Working closely with you to share expertise in developing innovative, high-quality products and services and in effectively managing risk.
- Engaging with you and others in your markets in ways that ensure we achieve the best value for customers in terms of price, quality, and social impact.
- Building strong, collaborative relationships with our strategic suppliers and helping you to understand the regulated environment in which we operate so that you can support us in achieving our purpose.
- Providing clear guidance about our payment procedures.
- Reviewing this Code regularly as our approach to responsible sourcing evolves.

Compliance with the Code

We expect all our suppliers to meet or exceed all the provisions of this Code and monitor supplier compliance with the Code as part of our internal third-party risk management activities. Our goal is to work with you on developing our approach to responsible sourcing.

In situations where you are not yet compliant with the expectations set out in this Code, you must let us know. We will work with you on the development of an improvement plan.

However, if the issue is serious enough or cannot be resolved in a reasonable time frame, we may undertake a review of the terms of your supplier contract with Bank of Ireland. This may include order reduction or, ultimately, in accordance with any applicable contractual right(s), termination of your supplier contract with Bank of Ireland.

FSQS will request evidence covering these topics, and you should provide as much information as possible where requested. We reserve the right to review and/or audit your policies, procedures or any other documentation related to this Code. In some higher risk instances, we may undertake an on-site or desk-based audit of suppliers to validate your adherence to this Code and applicable Group Third Party Policies.

Note: The provisions in this Code are in addition to the terms of your supplier agreement with the Bank. If there is any inconsistency between this Code and the terms of your supplier agreement with the Bank, the order of priority for the purposes of construction will be that your agreement terms take precedence over the content of this code.

Useful Links

You can access more information on how we work with our Suppliers at the ["Working with Suppliers"](#) section of www.bankofireland.com and view the [Group Modern Slavery and Human trafficking Statement at Sourcing Responsibly | Bank of Ireland](#).

More information on what doing business responsibly means for Bank of Ireland is available at the 'Responsible and Sustainable Business' section of www.bankofireland.com

We want to hear from you.

Please contact us with any feedback or questions you may have:



responsiblebusiness@boi.com



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