

## Speaking Up Policy

This Speaking Up Policy provides Stakeholders (employees, management, directors, creditors, depositors, service providers and others) with a secure, confidential way to report concerns about misconduct. To help highlight misconduct, the Bank must maintain a culture of integrity, transparency and trust by encouraging Staff and third parties - clients, contractors and vendors e.t.c (the 'Stakeholders') and to Speak Up when they have genuine concerns. This reduces the risk of financial and reputational loss caused by misconduct.

### Types of Concern to be reported

Stakeholders must report, through line management (for staff) or the Speaking Up Programme (for third parties) known or suspected misconduct relating to:

- (a) Breaches of law or regulation,
- (b) All forms of financial malpractice or impropriety;
- (c) Failure to comply with a legal obligation, regulatory directives or statutes;
- (d) Improper conduct or unethical behaviour;
- (e) Connected transactions;
- (f) Insider abuses;
- (g) Non-compliance with Bank Policies, Procedures; or Codes of Conduct;
- (h) Other forms of corporate governance breaches
- (i) Non- disclosure of interest
- (j) The concealment, or deliberate failure to report, a known control breach or weakness;
- (k) Any other threat to the Bank's reputation or
- (l) Attempts to conceal any of these, etc.

### How to Speak Up

Individuals can raise concerns by Speaking Up in several different ways. These include:

- (a) Send an email to [speaking.up@sc.com](mailto:speaking.up@sc.com) or visit [www.intouchfeedback.com/scb](http://www.intouchfeedback.com/scb) or
- (b) Call +44 121 713 7000 Access code 78000 (Toll free)

All Stakeholders have a responsibility to Speak Up if they suspect or believe any actual, planned or potential wrongdoing that breaches any law, regulation, Group policy or Group controls has occurred, is occurring or may occur.

All Speaking Up disclosures will be recorded reviewed and, where appropriate, independently investigated. An acknowledgement and where possible, feedback will be provided to the discloser raising the concern.

Every effort will be made to maintain the confidentiality of the discloser making a report (although where, for example, the report leads to legal proceedings, this cannot be guaranteed). Speaking Up reports and details of any associated work must only be passed to those who 'need to know', maintaining, where possible, the confidentiality of the discloser.

Unless a report has been made in bad faith, by reporting a concern known or should have known to be false, no discloser will be disadvantaged for Speaking Up, even if there is no conclusive evidence to support the concern raised.

This policy does not affect the right of a discloser to raise concerns in an appropriate manner directly with a regulator or external auditor as permitted by local law or regulation.

Any reports of known or suspected misconduct received from non-Staff will be treated using the same principles.