

# Human Rights Position Statement

Lloyds Banking Group Human Rights Position Statement

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Further information and documents supporting our approach to managing human rights such as our latest Modern Slavery and Human Trafficking Statement and specific sector position statements are available online <u>here</u>  $\rightarrow$ 

See our full reporting suite on the <u>Investors page</u>  $\rightarrow$ of our website.

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### Introduction

As one of the UK's largest financial services provider with millions of customers, we have an important role to play in creating a more sustainable and inclusive future for people and businesses, by shaping finance as a force for good.

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Creating a sustainable and inclusive future is core to our purpose of Helping Britain Prosper. Guided by our Group strategy, we are focusing on areas where we can have impact, delivering our purpose while creating value for all our stakeholders.

Core to our purpose and strategy is our focus on building a more inclusive and sustainable society, while creating new opportunities for our future growth. In doing this we aim to meet the needs of our broader stakeholders through sustainable growth, supporting the prosperity of the UK for generations to come.

Respecting human rights is embedded in our purpose, enabling us to support our colleagues, our clients and the communities in which we operate across the UK.

### Scope of the statement

This position statement provides an overview of our approach to human rights within our business and communities. It has been developed by consolidating the Group's guidance and policies that support the protection of human rights and integrate human rights decision making into our business operations.

This position statement applies to Lloyds Banking Group plc, its subsidiaries, employees and officers of the Group.

A full list of the Group's subsidiaries can be found in our Annual report and accounts  $\rightarrow$ 

## Our commitment to respect international human rights standards

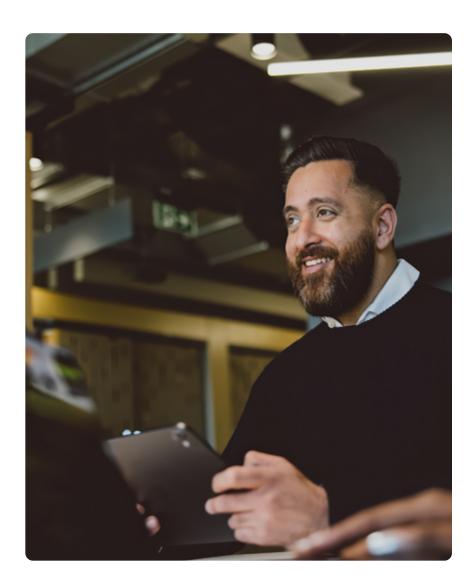
We use relevant international standards and commitments to inform our approach with regard to human rights.

Our statement is guided by the International Bill of Human Rights, the UN Declaration of Human Rights, and The International Labour Organization's Declaration on Fundamental Principles and Rights at Work, amongst other frameworks. We are committed to meeting these international standards as well as aligning to the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the United Nations Guiding Principles (UNGPs) and these are taken into consideration when developing policies, procedures and training for our colleagues, suppliers, clients and business partners.

We report annually against the UK Modern Slavery Act (2015) on the steps we take to combat modern slavery and human trafficking across our business and operations. Our most recent Modern Slavery Statement can be found here  $\rightarrow$ 

Where national law and international human rights standards differ, we are mindful of local contexts, carefully assessing relevant international standards to determine an appropriate framework for operating in areas in which there are relevant material human rights implications.

We expect our suppliers, corporate customers, and investees and mandated asset managers to uphold these same standards.



### Our commitment to respecting human rights is guided by:

- The International Bill of Human Rights
- The UN Declaration of Human Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The International Labour Organization (ILO) Conventions No.138 (Minimum Age) and No.182 (Worst Forms of Child Labour)
- The United Nations Guiding Principles on Business and Human Rights (the 'Ruggie Principles')
- The OECD Guidelines for Multinational Enterprises
- The UN Sustainable Development Goals (SDGs)

### We are signatories to:

#### • The UN Global Compact:

We are aligned with its human rights and labour standards, and report on our progress annually through the Communication on Progress and actively participate as members of the UNGC to learn from our peers on human rights

• The UN Environment Programme Finance Initiative (UNEP FI):

Principles for Responsible Banking and Principles for Sustainable Insurance, and through Scottish Widows, we are signatories to the UN Principles for Responsible Investment (UNPRI)

The Equator Principles:

A set of environmental and social risk management principles applied in the context of project and corporate finance.

The Group recognises its influence and impact as a financial services organisation on the human rights of a range of stakeholders, including as a provider of financial services, employer, contractor, procurer, investor and supporter of communities.

### Developing our approach

Our approach is set out in this position statement along with details of other policies and procedures relevant to human rights. We have reviewed human rights topics raised through our own analysis through developing an understanding of our context, including aspects such as our geography, markets in which we operate, sector, products, services and activities, as well as through horizon scanning, industry human rights benchmarks and stakeholder engagement. Our internal environment includes colleagues, processes and policies, culture and management. In addition to the views of our stakeholders, we acknowledge the growing focus on human rights issues through evolving regulations across the globe. We constantly review industry developments related to the identification of material human rights topics in the finance sector to ensure that the information needs of our shareholders and broader stakeholders are considered.

#### Identification of our salient human rights risks

The UNGP's Reporting Framework asks companies to focus their human rights reporting on their salient human rights issues. A company's salient human rights issues are those human rights that stand out because they are at risk of the most severe negative impact through the company's activities or business relationships.

During 2023, we worked with an external party to identify and prioritise the inherent salient human rights risks that can be connected to the Group's operations and value chain. The aim of the activity was to have an external and independent review of potential human rights risks for the Group without taking into consideration any of our current programmes, policies or initiatives, primarily for the Group to ensure that we aren't missing any key aspects of human rights risk related to our activities. An inherent salient human rights risks is based on the risk to the affected parties involved, not to the Group necessarily.

The scope of this work covered all the Group's subsidiaries, and aimed to identify where the Group could cause, contribute or be connected to human rights issues across our value chain.

#### Affected parties considered included:



- Colleagues and contractors
- Customers and clients
- Workers and communities affected by financing that the Group has provided through our commercial banking, insurance clients and investee companies
- Supply chain: workers and communities affected by the Group's supply chain and sourcing activities

We aim to review our salient human rights risks every two years.

### Stakeholder key



approach

Our

### In this section

Identification of our salient human rights risks 04

### Identification $\rightarrow$ of our salient human rights risks

Having identified the inherent salient human rights risks, the Group has reviewed the associated business processes to identify any gaps, and implement measures to further prevent or mitigate these potential human rights risks.

#### To identify our salient human rights risks, the Group undertakes a process of: Activity within the Group to protect 06 human rights is 05 01 02 03 04 focuses on: Identify Consider Review **Review** Review Assess Diversity, equity and inclusion Colleague employment Understand and Map and identify Consider external Review the risk Assess and Review the risks standards, and health high-risk sectors stakeholder views assessment findings prioritise the risks with impacted review the context and safety of the Group, its related to human related to human business areas and assess the level based on severity Harassment and discrimination products and rights issues. rights risks to of exposure that and likelihood. and validate. Mental health and colleague services. the sector. the Group has to wellbeing in the workplace the sector through Financial empowerment its activities and Supporting customers who the level of leverage are more vulnerable that the Group Tackling modern slavery may have to affect issues through our supply change related to chain activity the risks and how Protecting **customer privacy** the Group may be **Data security** and ensuring causing, contributing we keep our customers' money or directly linked and data safe to the risks. Human rights risks related to our lending and investments Whistleblowing Our identified inherent salient human rights risks across our value chain -Age Age Ē

### ഷ്പ

Colleagues

Discrimination

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Sourcing and our supply chain

- Modern slavery • Migrant labour and labour rights
- Å

**Retail customers** 

- Discrimination
- Economic exploitation
- Inadequate standard of living

**Business banking customers** 

- Modern slavery
- Migrant labour
- Labour standards and health & safety

Corporate and commercial banking clients

- Modern slavery
- Migrant labour
- Inadequate standard of living

and pensions

- Modern slavery
- Migrant labour
- Inadequate standard of living

Our board and governance

# Governance

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The Group's approach to human rights is governed by the Responsible Business Committee, a sub-committee of the Group Board. To date, we have already embedded several policies and processes within our business to manage issues associated with human rights abuses.

The effective management of human rights issues relies on the integration of the human rights principles into Group guidelines and policies. The accountable executive for the Group's human rights and modern slavery approach is Andrew Walton, Chief Sustainability Officer. As part of his role on the Group Executive Committee, he is responsible for championing our Group approach to human rights as well as the publication of our annual Modern Slavery Statement and Human Rights Position Statement.

The Group's day-to-day management of human rights is coordinated and driven by the Group Sustainable Business function and is guided by a cross-divisional working group, the Modern Slavery and Human Rights Working Group. This working group has input from functions across the Group including, but not limited to, our Group People and Places teams, Group Sourcing and Supplier Management, Group Economic Crime Prevention, Retail and Commercial Banking teams, as well as external human rights experts.

Aligned boards Lloyds Bank plc <sup>1</sup> HBOS plc Bank of Scotland plc <sup>1</sup>	Lloyds Bank Corporate Markets plc Non-Ring- Fenced Bank	Scottish Widows Group Limited	LBG Equity Investments Limited Equity Investments
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1	1		I
Responsi	ble Au	dit E	Board Risk
Busines	s Comm	nittee C	ommittee
Committ	cee		
	1	<b>`</b>	
	Executiv	ve level	

Group Executive Committee

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#### **Group Modern Slavery and Human Rights Working Group**

- BCB Social Sustainability Group Sourcing
- Chief Credit Office ESG Group Sustainable
- Credit Risk Lloyds Living
- Consumer division
- Group Conduct
- Investigations
- Group Customer Inclusion Lloyds Bank Corporate
- Group Economic Crime Prevention
- Group People & Places
- Group Learning
- and Development
- Scottish Widows Responsible Investment

and Supplier Management

Investment, Pensions

Investment, Pensions

and Insurance Risk

and Insurance

1 Ring-Fenced Banks

Business

Markets

• LDC

# → Our policies, frameworks and procedures

The Group's commitment to respecting human rights in the workplace is embedded in our purpose, our values and through our policies and frameworks. A number of policies, frameworks and procedures support our commitment to operating responsibly, both as a business and at an individual level. These policies promote and protect human rights and are developed and approved in accordance with formally defined governance structures.

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**Our suppliers** 

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<b>Our customers</b>	
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Our colleagues
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Group data policy	Group colleague policies	Speak Up (whistleblowing)
Group compliance policy	Health, safety and fire policy	Code of Supplier Responsibility
Anti-bribery policy $\rightarrow$	Harassment and grievance resolution policy	Third party policies for suppliers →
<u>Group external sector statements</u> $\rightarrow$	Group accountability standards	
Group customer policy (including customer complaints and redress)	Speak Up (whistleblowing)	
Product governance policy	<u>Code of Ethics and Responsibility</u> $\rightarrow$	
Scottish Widows Responsible Investment and Stewardship Framework →	<u>Colleague Handbook</u> →	
ESG Credit Risk policies		
Group Economic Crime Prevention policy		

Our policies and frameworks cover provisions for the following human rights issues:

- Non-discrimination and harassment
- Equality
- Child labour
- Minimum wage workForced/bonded labour
- Freedom of association/ collective bargaining
- Health and safetyWorking conditions,
- including hours
- Right to strike
- Accessibility for persons
   with disabilities
- Maternity and paternity
   protection
- Fair remuneration and ethical recruitment
  Economic crime
- Economic crime prevention
- Respecting the rights of
   indigenous communities
- Anti-bribery and corruption, anti-money laundering and counterterrorist financing
- Financing of high-risk
- human rights sectors

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# Human rights impacts

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It is critical to our business to act with the highest standards of integrity and honesty in delivering for our customers. In addition, we know that finance has an important role to play in influencing better social, human rights and environmental outcomes, and we take this into account in our investment, lending and service operations.

We recognise that in carrying out our activity (in our role as an employer, lender, procurer of goods and services, asset manager or in providing financial services to individuals), there is a risk that, unintentionally we may impact human rights.

Our approach to human rights, therefore, focuses on our relationships with:

- Banking customers Retail customers, corporate and commercial banking clients
- Colleagues
- Suppliers
- Pension and insurance customers
- Portfolio companies

## → Human rights and our Retail customers

We believe in being fair and transparent, ensuring access to vital financial services that act as the foundation for many other human rights including access to housing and work.

We have a customer policy that helps ensure we treat customers fairly and we provide customers with access to appropriate, affordable, responsibly structured credit; supporting them when they have financial difficulties; and investigating any complaints they have, thoroughly and fairly, including where they feel we have impacted their human rights.

We are sensitive to the challenges some people face in financial matters and through our financial inclusion and education programmes we focus on improving access to financial services and building financial skills. Our Group Vulnerability Strategy outlines our approach to supporting those who may be more vulnerable or excluded, including those with mental health challenges, those with a critical illness, older customers, those with gambling issues, and victims of domestic abuse, financial abuse, and modern slavery.

We want all of our customers to have an excellent service experience and to be able to access our services in a way that is right for them, wherever they are.

Our Digital Helpline is accessible and provides British Sign Language translation and speech to text services for customers who are deaf or have hearing loss.

Our branches are designed to be as inclusive as possible for all our customers and we have launched the Hidden Disabilities Sunflower scheme across all our Halifax and Bank of Scotland branches. As some disabilities are not immediately visible, the lanyards are used to discreetly indicate that the wearer may need a little more support and prompt a conversation.

## → Human rights and our Corporate and Institutional Banking clients

Within our Commercial Banking division, we regularly review our customers and clients that we have a direct banking relationship with through our 'Know Your Customer' due diligence.

We ensure that environmental, social and governance (ESG) related risks are considered for all Commercial Banking clients with whom we have a direct lending relationship, with specific commentary in new and renewal credit applications where total aggregated hard limits exceed £500,000 (excluding automated decisionmaking processes and digital or telephony applications for smaller counterparties).

For project financing activity, the Group is also a signatory to the Equator Principles and ensures they are applied to all relevant transactions. In Corporate and Institutional Banking, our reputational risk assessment specifically looks to identify any human rights issues, including displacement of indigenous peoples; child and forced labour; modern slavery; human trafficking; and exploitation of poverty, including consideration of supply chains. An additional topic which is covered is the assessment of our clients' engagement with countries with poor human rights records.

Where appropriate, we have regular engagements with our clients with whom we have a direct lending relationship, and regularly review their public filings, press reports and analyst presentations. If we become aware that a client has breached any applicable international, regional or national laws, we would require the client to implement action plans that aim to address and resolve such breaches. We regularly review all of our clients with whom we have a direct lending relationship, and where they appear to be operating below our requirements, we work with them to understand how they plan to transition to meet these requirements.

We have specific statements for sectors that are known to have prominent social and environmental risks. These sector statements detail our expectations of our Commercial Banking clients and specify that we expect clients to respect human rights, both of their own workforce and their supply chain.





## → Human Rights and our Insurance, Pensions and Investment customers

# We integrate ESG factors into our decision making to help mitigate ESG risks and explore opportunities.

This enables us to build more resilient investment portfolios for our customers in the long term by providing some downside protection, upside potential and shaping a better world to retire into.

Social factors, such as labour rights, are central to the societal infrastructure which the global economy relies on for delivering sustainable, long-term growth.

As long-term investors and universal owners, we are increasingly aware of how systemic ESG risks may impact our investment portfolio and are working to build our understanding of the different risks.



### **Research and data**

Our work on social factors is underpinned by research including recommendations made by the Taskforce on Social Factors and portfolio analysis. Our analysis supports us in understanding which sectors and risks appear in our portfolio as well as current standards and gaps in data.

Our work is constantly evolving as we consider our stewardship approach, engage our investment managers and influence fund development. The aim is for social factors to also feed into our investment strategies as data availability, consistency and standardisation improves.

### Exclude

As outlined in our Scottish Widows Exclusions Policy  $\rightarrow$  we act in accordance with the UNGC, which includes the principles that businesses should make sure that they are not complicit in human rights abuses and should uphold the elimination of all forms of forced and compulsory labour.

Our Exclusions Policy applies to a number of categories, but the ones most pertinent to the human rights violations are:

- Controversial weapons
- Tar sands
- Tobacco
- Violations to UNGC principles (labour rights and human rights form two pillars of the compact and are accompanied by six labour and human rights principles)



### Integration and oversight

Integration of financially material social factors is an important aspect of our approach which we are continuously involving. We also expect our asset managers to integrate financially material social factors into their investment processes and engage on social issues.

Providing oversight of how they go about this is an important part of our role. On an ongoing basis, we discuss topics such as human rights due diligence in supply chains, workers' rights, DEI, and executive compensation. We focus on efforts to ensure human rights are respected and companies we invest in, which are in high-risk sectors, have mechanisms in place to avoid and prevent adverse human rights, as well as contributing to higher standards.

### Engage and collaborate

We chose human rights as our social factor stewardship theme in 2022, and since then have grown our company engagement activities and collaboration to cover multiple sub-themes across sectors and geographies. Engaging with companies and voting on shareholder resolutions is central to our stewardship approach and builds on our assessment of our investment portfolio.

Our approach to collaboration includes engagement with policy makers and the development of regulation and frameworks to support the investment industry. Initiatives that support our approach include the Workforce Disclosure Initiative, the Investor Initiative on Human Rights Data, linked to the World Benchmarking Alliance Collective Impact Coalition, ShareAction Good Work Coalition and Fair Reward Framework.

For more information, please see the <u>Scottish Widows</u> <u>Our approach to social factors (scottishwidows.co.uk)</u>  $\rightarrow$ 

### Human rights and our colleagues $\rightarrow$

We employ over 66,000 permanent colleagues across the Group and are committed to creating a work environment that encourages and values the unique differences our people bring with them to work every day, and where everyone can reach their full potential.

You can read more about how we support our colleagues in our Sustainability Report  $\rightarrow$ 

### Fair remuneration and ethical recruitment practices

The UK's Living Wage Foundation has accredited the Group as a Living Wage Employer, and we review our pay rates annually to ensure minimum rates are above the statutory minimum and living wage requirements that are applicable within the countries where we operate.

We have worked, and continue to work, with third-party contractors to ensure that they operate in line with our commitments, and we expect them to ensure that the wages they pay meet legally mandated minimum wage requirements. We have integrated the employer pays principle into our recruitment practices, ensuring that no employees of the Group or temporary or contract workers have paid recruitment fees to secure employment without unauthorised deductions being taken or financial burdens being imposed



To respect the human rights of our colleagues we ensure:

- Fair remuneration and a living wage
- Fair and non-discriminatory recruitment
- Fair representation
- · Non-discrimination, inclusivity and equality, no harsh or degrading treatment, no harassment
- Support for the mental health and wellness of colleagues
- Freedom of association/collective bargaining
- Health, safety and wellbeing of colleagues, contractors and visitors
- Accessibility for persons with disabilities
- Maternity and paternity protection
- Grievance mechanisms and whistleblowing
- Performance management

Please see our Sustainability report for our progress on these topics.

# $\rightarrow$ Group sourcing and supplier management

We are committed to working collaboratively with our suppliers on developing our approach to responsible and sustainable sourcing: this is integral to the way we do business.

We expect all suppliers to respect human rights within their own workforce and in their own supply chain and to uphold the same high human rights standards as the Group.

Our Code of Supplier Responsibility outlines the commitments regarding human rights and labour issues suppliers are expected to make and adhere to, including:

- The prohibition of child labour
- Ensure that wages meet legally mandated minima without unauthorised deductions
- Allow employees to legally organise and join associations (such as labour unions)
- Ensure working hours are in accordance with local regulation and industry practice and voluntary overtime is at a manageable level
- Treat all employees and workers fairly and not harass or discriminate against any group or individual in their employment practices, in particular based on gender, race, age, sexual orientation, gender identity, disability, faith, or family circumstances
- Ensure there are no negative consequences for anyone who raises a concern
- Champion their workforce and customers' health, safety and wellbeing

For suppliers in higher risk sectors such as construction. facilities, technology, and recruitment we expect a continuous improvement approach with evidence of actions being taken to mitigate the associated risks.

Where a supplier fails to meet the expectations set out in the Code, we commit to working with them to develop an improvement plan. Based on best practice we understand that collaborating with suppliers allows for the implementation of corrective actions to improve working conditions and support for affected workers. and that approach can help victims of modern slavery receive the assistance they need. However, if a supplier is unwilling or unable to make necessary changes, or the issue is sufficiently serious or cannot be resolved in a reasonable timeframe, it may be necessary to terminate the relationship as a last resort after all other avenues have been explored.

The Group Sourcing Supplier Assurance team conducts an annual programme of reviews. Suppliers that trigger agreed risk criteria are selected for a supplier review conducted by experts through a combination of onsite and remote assessment, to test the supplier's adherence to relevant Group policies.

# $\rightarrow$ Supporting our communities

We are committed to help protect human rights and improve opportunities for people living in the communities we serve.

Our support for local communities is focused on tackling social disadvantage and helping vulnerable people or those excluded from mainstream banking.

Our four independent charitable Foundations have been providing vital support to small charities across the UK and Channel Islands for the last 39 years, helping tackle social disadvantage in the communities that need it most, partnering with us in our purpose of Helping Britain Prosper.



### Strategic charity partnerships

We are working with Crisis (and Simon Community in Northern Ireland) to help them to provide the support that will help people to leave homelessness behind for good. Through our partnership, Crisis has established an innovative Good Place lettings agency, breaking down the barriers that people face in accessing affordable housing. Our partnership is also helping people to rebuild their lives and become financially secure through the Changing Lives grant programme.

### Partnerships to support survivors of domestic and financial abuse

Our Domestic and Financial Abuse team, set up in 2019, supports survivors to rebuild their financial confidence.

### Drug trafficking and financial exploitation

We work collectively with industry bodies, law enforcement, including county lines, regulators and governments to protect young people. These partnerships are crucial to our ambition to reduce crime across society and to Help Britain Prosper. Further information on these initiatives can be found in our Sustainability Report.

# $\rightarrow$ Climate change as a human rights risk

Whilst we do not identify the impact on climate change as an explicit salient human rights risk for the Group, we recognise the impact of climate change on human rights.

We are committed to playing our part in supporting the transition to net zero in a just and fair way. We remain committed to working with customers, government, and the market to help reduce the carbon emissions that we finance by more than 50 per cent by 2030 on the path to net zero by 2050 or sooner, and halving the carbon footprint of our investments by 2030. We have also published the Scottish Widows Climate Action Plan  $\rightarrow$ 

### Supporting a Just Transition

We recognise the importance of a transition to net zero that generates benefits for both the environment and society and are committed to supporting a Just Transition, which respects both the environment and human rights.

Our purpose enables us to consider and embed activities to support a just transition for the UK through our purpose pillars. A Just Transition means greening the economy in a way that is fair and inclusive to everyone concerned, creating decent work opportunities, leaving no one behind, and we continue working to identify ways we can support the transition to net zero whilst retaining focus on key social objectives such as skills, affordability, education, and regeneration across sectors, regions and the range of our customers.

# → Grievance mechanism and access to remedy

The UNGPs fundamentally acknowledge that grievance mechanisms must be known, trusted and accessible to those who need it. We are committed to supporting access to effective remedy for individual victims of human rights violations.

For our colleagues and suppliers, the primary human rights grievance mechanism is our Speak Up framework. Customers can engage with us on human rights issues through our customer complaints channels.



Lloyds Banking Group is committed to continuously improving our mechanisms and remediation processes through stakeholder engagement and dialogue, to maintain alignment with the expectations for effective mechanisms set out in the UNGPs.

### Stakeholder key





### Colleagues

Speak Up is the Group's whistleblowing framework, providing a confidential or anonymous channel for colleagues, suppliers, contractors and third parties to report their concerns where they feel unable to via their manager. Reports can be made in several ways including through an independent third party (available 24/7, in a range of languages).

Lloyds Banking Group promotes a culture where people feel safe, supported, and empowered to speak up if they see or suspect something that doesn't feel right. We are committed to preventing and addressing any form of retaliation resulting from someone raising a Speak Up concern.

All concerns are taken seriously and treated sensitively. Where investigations are required, these are carried out by highly trained and empathetic investigators. The identity of anyone who raises a concern will not be shared beyond our Speak Up team (unless required by law). Anyone reporting a concern or involved in an investigation is supported throughout the process.



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### **Supply Chain**

Contractors and suppliers can raise their concerns confidentially and anonymously by using our Speak Up service. It's managed by an independent company, which has expertise in dealing with reports of misconduct. All reports to Speak Up are taken seriously and dealt with sensitively. The Speak Up service can be contacted online or by phone.

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### Civil society organisations

We engage with, and respond directly to, civil society organisations on human rights issues. We regularly review benchmarking and reports to ensure that we continuously understand the expectations of our stakeholders and consider these in the ongoing improvement of our processes.

### Customers and clients

The Group is a signatory to The Equator Principles and ensures their application in all applicable project finance activity. Human rights is a specific topic covered for our Corporate and Institutional Banking clients, including the requirement to meet the need for an operational project level grievance mechanism on projects and transactions that fall within the scope of the principles and where a higher risk of human rights issues has been identified.

#### Customer complaints

The Group has a well-established framework to continually address the root cause of complaints, taking action to mitigate the drivers, improving our customers' experience.

# → Raising awareness and training our colleagues

We are committed to help protect human rights and improve opportunities for people living in the communities we serve. Training is supported by other internal awareness initiatives and campaigns which run on an ongoing basis.

For further information on our latest campaigns, initiatives and progress, please see our <u>Sustainability</u> <u>Report</u>  $\rightarrow$ 

We have mandatory training for colleagues in the UK and overseas to ensure inclusivity is at the heart of what we do. In the UK, this includes training on discrimination, bias, harassment or bullying.



### Training modules

### 01 Speak Up

All colleagues complete annual mandatory training on how to raise their concerns, and this includes details of the support available to them throughout the process and all of our third-party employees working for, or on behalf of the Group, are also briefed on how to report their concerns via our Speak Up service. We investigate all cases of modern slavery, or any other human rights concerns reported to us, through our Speak Up service.

### 02 Economic Crime Prevention

Our Economic Crime Prevention mandatory training includes a module focused on the laundering of funds from modern slavery and supports colleagues in their understanding of modern slavery red flags. Colleagues learn about the different ways an individual may be exploited by a trafficker through control of their bank account and identity documents.

### 03 All-colleague Modern Slavery Training

The aim of this training is for colleagues to have a better understanding of the scale and forms or modern slavery, and the importance of awareness and proactive measures. The training was developed with input from the Modern Slavery and Human Rights Working Group and includes a series of videos of colleagues across the Group explaining how it impacts their business areas and what they are doing to tackle modern slavery, to support colleagues in gaining an understanding of how the Group tackles modern slavery.

### 04 Modern Slavery in the Supply Chain

The aim of the Modern Slavery in the Supply Chain training is to raise awareness of this complex crime, learn valuable insights from experts, and understand good business practice around detecting and preventing modern slavery. This training is for our supplier managers and sourcing managers.

### 05 Race Education

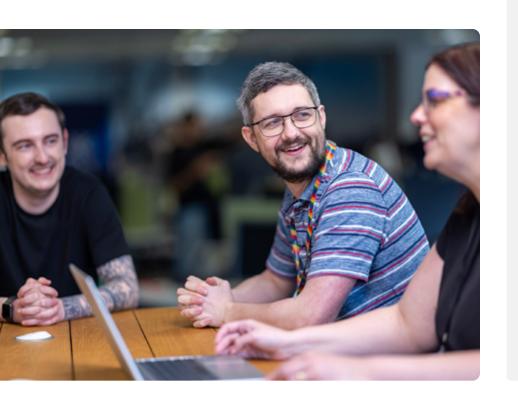
As a Group, we're committed to ending racism and discrimination within our organisation. This learning is for all colleagues and shows how to recognise behaviour that's not inclusive and understand the practical steps they can take towards allyship.

### 06 Inclusive for Customers

This training supports colleagues in understanding the importance of being inclusive for all customers. It focuses on how both customer and non-customer facing colleagues have a part to play in supporting all customers, including those who are vulnerable. For example, this could be through direct customer contact or in the design of our products and services. Colleagues will have an opportunity to explore additional resources which will help support being inclusive for all customers. Our approact

### → Engaging with stakeholders and affected rights holders

Stakeholder engagement takes place at all levels within the Group and is an important part of how we are delivering on our purpose of Helping Britain Prosper.



#### How we engage our stakeholders

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### Customers

By providing the right tools and resources, we are actively working to prevent financial difficulties from arising in the first place. This proactive stance can make a meaningful difference in people's lives.

 Customers can access support through multiple channels to seek help with their financial wellbeing or navigate the cost of living. Through our Lloyds Bank, Halifax and Bank of Scotland branches, customers can book an appointment with a specially trained colleague who can support them with any money worries. We also had more than 4,000 colleagues helping to provide financial assistance to customers in financial difficulty through tailored treatments and products

Read more about how we support our customers in our <u>Sustainability</u> <u>Report 2024</u>  $\rightarrow$ 

### Colleagues

2023

We welcome the views and opinions of our colleagues on a range of topics to help them grow, and us to grow as a business.

- MyVoice: Our Transformation is the name of our annual allcolleague survey and it's a key part of our overall colleague listening approach. All year we stay close to how our colleagues feel about working here through our Pulse surveys, focus groups, and listening sessions
- We support our colleagues' rights to exercise freedom of association and have extensive consultation and collective bargaining processes in place. We have a recognition agreement with two trade unions that collectively consult and negotiate on behalf of our UK workforce

Read more about how we engage with our colleagues in our Sustainability Report 2024  $\rightarrow$ 

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### Communities

We engage with charities, NGOs, campaign groups and think tanks on a range of issues related to human rights.

- We are a member of the UNGC Modern Slavery Working Group as part of our membership of the UN Global Compact and UNEP FI Human Rights Community of Practice, through which we engage with other businesses and peer financial institutions as well as NGOs and charities on human rights issues
- We are members of the Unseen UK Business Hub to better understand issues related to modern slavery and labour exploitation
- We attend the UN Business Forum on Human Rights annually

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### **Suppliers**

We proactively engage with our suppliers to understand the risk of human rights abuses including modern slavery in the supply chain.

- We have engaged with targeted suppliers through Know Your Supplier meetings and visits to understand how they are mitigating human rights risks across their business operations, as well as through training opportunities provided by Lloyds Banking Group on topics including modern slavery and labour exploitation
- Our Supplier Sustainability Summit provides the opportunity to engage our suppliers on sustainability issues and share insights and provoke discussion through roundtables
  We support our suppliers via the Emerald Standard. This standard sets out clear expectations in relation to environmental, social and governance performance, shaping the way we collaborate on this important topic

### → Forward-Looking Statements

#### Disclaimer

The reader should be aware that this document, and the information contained within it, has been prepared on the following basis: (i) this document and its contents are not externally audited; (ii) all material contained in this document is subject to change without notice; (iii) the material in this document does not constitute any investment, accounting, legal, regulatory or tax advice or an invitation or recommendation to enter into any transaction; (iv) estimates expressed in this document should be regarded as indicative, and for illustrative purposes only; and (v) this document has been prepared using models, methodologies and data which are subject to certain limitations (as explained in the "models, methodologies and data" section below). Expected and actual outcomes may differ from those set out in the document (as explained in the "forward-looking statements" section below).

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This document contains certain forward-looking statements within the meaning of Section 21E of the US Securities Exchange Act of 1934, as amended, and section 27A of the US Securities Act of 1933, as amended, with respect to the business, strategy, plans and/or results of Lloyds Banking Group plc together with its subsidiaries (the Group) and its current goals and expectations. Statements that are not historical or current facts, including statements about the Group's or its directors' and/or management's beliefs and expectations, are forwardlooking statements. Words such as, without limitation, 'believes'. 'achieves', 'anticipates', 'estimates', 'expects', 'targets', 'should', 'intends', 'aims', 'projects', 'plans', 'potential', 'will', 'would'. 'could', 'considered', 'likely', 'may', 'seek', 'estimate', 'probability', 'goal', 'objective', 'deliver', 'endeavour', 'prospects', 'optimistic' and similar expressions or variations on these expressions are intended to identify forward-looking statements. These statements concern or may affect future matters, including but not limited to: projections or expectations of the Group's future financial position, including profit attributable to shareholders, provisions, economic profit, dividends, capital structure, portfolios, net interest margin, capital ratios, liquidity, riskweighted assets (RWAs), expenditures or any other financial items

or ratios: litigation, regulatory and governmental investigations: the Group's future financial performance; the level and extent of future impairments and write-downs: the Group's ESG targets and/or commitments: statements of plans, objectives or goals of the Group or its management and other statements that are not historical fact and statements of assumptions underlying such statements. By their nature, forward-looking statements involve risk and uncertainty because they relate to events and depend upon circumstances that will or may occur in the future. There are inherent risks and uncertainties associated with achieving future emissions targets and implementing net-zero transition strategies and plans in a complex, interdependent, and continually evolving global landscape. The Group therefore reserves the right to adjust, amend, or adapt its metrics and targets in response to unforeseen circumstances or changes in external factors and dependencies which impact the feasibility of achieving the stated targets.

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matters, such as climate change (and achieving climate change ambitions) and decarbonisation, including the Group's ability along with the government and other stakeholders to measure, manage and mitigate the impacts of climate change effectively, and human rights issues: the impact of competitive conditions: failure to attract. retain and develop high calibre talent; the ability to achieve strategic objectives; the ability to derive cost savings and other benefits including, but without limitation, as a result of any acquisitions. disposals and other strategic transactions; inability to capture accurately the expected value from acquisitions; assumptions and estimates that form the basis of the Group's financial statements; and potential changes in dividend policy. A number of these influences and factors are beyond the Group's control. Please refer to the latest Annual Report on Form 20-F filed by Lloyds Banking Group plc with the US Securities and Exchange Commission (the SEC), which is available on the SEC's website at www.sec.gov, for a discussion of certain factors and risks. Lloyds Banking Group plc may also make or disclose written and/or oral forward-looking statements in other written materials and in oral statements made by the directors, officers or employees of Lloyds Banking Group plc to third parties, including financial analysts. Except as required by any applicable law or regulation, the forward-looking statements contained in this document are made as of today's date, and the Group expressly disclaims any obligation or undertaking to release publicly any updates or revisions to any forward-looking statements contained in this document whether as a result of new information. future events or otherwise. The information, statements and opinions contained in this document do not constitute a public offer under any applicable law or an offer to sell any securities or financial instruments or any advice or recommendation with respect to such securities or financial instruments.



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