

## Speaking Up: Summary of Procedure

**We are committed to maintaining a culture of the highest ethics and complying with our Code of Conduct. We encourage Staff and any other person who has a genuine concern about misconduct to raise it through our Speaking Up programme.**

### Staff

1. Staff have a responsibility to Speak Up through the Speaking Up programme if they have known or suspected concerns in relation to the activities of the Group, including, for example, 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. It is not necessary for there to be proof of the concern before Speaking Up as long as the concern is based on a reasonable foundation. However, the Group does not tolerate disclosures made in bad faith where Staff know or should have known the disclosure to be false.
2. The Group provides Staff with access to specific, independent, confidential and secure means to Speak Up.
3. All Speaking Up disclosures will be recorded, reviewed and, where appropriate, independently investigated. An acknowledgement and where feasible and appropriate, feedback will be provided to the discloser raising the concern.
4. Speaking Up disclosures, including the identity of the discloser and the subject of the Speaking Up disclosure, will be kept confidential and will be disclosed only a strict need to know basis.
5. The Group prohibits any form of victimization of, or detriment against, disclosers for Speaking Up.

6. This does not affect the right of a discloser to raise concerns directly with a regulator or external authority as permitted by local law or regulation. Disclosers can also seek advice from whistleblowing charities.
7. Any reports of known or suspected concerns received from non-Staff will be treated using the same principles.

### Any other person/ members of the public

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Members of the public can securely raise Speaking Up concerns through a website which is hosted by a third party 'InTouch', on our behalf.

Complaints relating to SCB banking services should not be raised through the **Speaking Up programme** in the first instance, but through our branch network, contact centres, Relationship Managers or the relevant country '**Contact Us**' webpage.