

The Co-operative Bank

Environmental, Social and Governance Business Approach 2025

Introduction

2025 has been a landmark year for The Co-operative Bank so far, as we returned to mutual ownership in January following the purchase of the Bank by Coventry Building Society. After celebrating 150 years of ethical banking in 2022, it was important for us to live up to our position as the original ethical bank, embodying the co-operative values on which we were founded back in 1872 whilst continuing to embed Environmental, Social and Governance (ESG) across the business.

Throughout the year, our focus on supporting and bringing about change for our planet, for people and for our communities, through delivering on the commitments outlined in our unique, customer-led Ethical Policy has not changed. For over 30 years, our Ethical Policy has guided how we do business, informed by responses from 370,000 of our customers since its first iteration in 1992.

The Bank is incredibly proud to introduce this ESG Business Approach which evidences the activities, initiatives, products, policies and campaigns that make us a market leader in ESG.

About The Co-operative Bank

The **co-operative** bank

Ethical then, now and **always**

The Co-operative Bank at a glance

Methodology and overview

The Co-operative Bank has been a leader in ethical banking for over 150 years. Driven by co-operative values and our customer-led Ethical Policy, we are the bank that's changing our communities, for good. Our vision is to be the UK's leading ethical bank - together with our customers we make banking a positive force for good.

Our Business Approach Methodology

Our stakeholders, including our investors and ultimate sole shareholder, Coventry Building Society (the 'Society'), assess our ESG performance through their own research and through the valued assessments of ESG risk rating agencies including MSCI and ISS amongst others. This pack has been designed to aid both stakeholders, risk rating and rating agencies in assessing our implementation of ESG practices and ESG risk management, as well as initiatives and policies we put in place to further embed ESG into our business. In the following pages, you will see the full extent of how ESG plays a part in what we do every day.

The Co-operative Bank key notes to readers

- The Co-operative Bank provides a full range of banking products and services to retail and SME (Small and Medium Sized Enterprises) customers and is committed to values and ethics in line with the principles of the co-operative movement.
- The Co-operative Bank is a UK only bank and does not operate anywhere else in the world.
- The Co-operative Bank does not offer any wealth or investment management services.
- The Co-operative Bank is subject to and compliant with all UK legislation and regulation. The United Kingdom has laws in place in relation to a wide range of employment and business practices, and The Co-operative Bank is compliant with these.



Our business model as depicted in our 2024 Annual Report and Accounts

The Co-operative Bank at a glance

The Original Ethical Bank



In 2022, we marked the 150th Anniversary of The Co-operative Bank. The Bank's story began in 1872, as the Loans and Deposits department of the Co-operative Wholesale Society, and we have worked hard ever since to provide our customers with a real alternative to the larger retail banks. We always put our customers at the heart of what we do and we are committed to the values and ethics of the co-operative movement.

We offer high street, telephony and online services, including current accounts, savings, mortgages, personal loans and credit cards to retail customers and offer banking services for small and medium sized businesses, charities, social enterprises and co-operatives including current accounts, savings, loans, overdrafts and credit cards.

On 1 January 2025, Coventry Building Society completed its purchase of The Co-operative Bank Holdings p.l.c. We have returned to our roots, being owned by a mutual — an organisation which is owned by and run for the benefit of its members. Combined, we have total assets of approximately £90 billion, making the new group the seventh largest lender in the UK.

Read more about us
here



Our Ethical Policy

Our commitment to co-operative values and ethics has been fundamental to us since we established the Bank in 1872 and still underpin how we run our business. To outline our ethical commitments, in 1992 we took a pioneering step and introduced a customer-led Ethical Policy. We were the first bank in the UK to do so, and are still the only UK high street bank to have one of its kind.

We often ask our customers to tell us about the things that matter to them, through a Values and Ethics and regularly update our Ethical Policy to reflect this. After listening to our customers, our latest Ethical Policy focuses on what we do for our planet, people, and the community, and our commitments within these spaces.

Read our latest Ethical
Policy here



View the results of our
latest Ethical Poll (2021)



The Co-operative Bank at a glance

Our guiding values

Our Guiding Values set out the key behaviours that will help us to deliver on the Ethical Policy and our brand promise to our customers.

The way we work sets us apart, as a different kind of bank. As colleagues and leaders, we need to have conversations about how we deliver our business strategy guided by our values, which have been created with and for us all. Our Values have not been defined in isolation. They are our own words and they stand for who we are and how we work.

Take Responsibility



We are performance driven, we look for and drive opportunities and risks, and deliver good customer outcomes

Do the Right Thing



We listen, understand and challenge constructively to deliver for our Bank, colleagues, customers and communities

Step Up



We embrace change, seek to continuously improve and simplify the Bank with a can do, will do attitude

Stronger Together



We are People with Purpose, collaborating with respect and challenge, focusing on shared goals to unlock our co-operative spirit

Colleagues are recognised and held to account for 'how' they work as well as 'what' they do as part of performance management. The 'How' and the 'What' form part of objective setting and development discussions with leaders.

The values are embedded throughout our colleague lifecycle including our recruitment and on-boarding processes and colleagues receive annual training as a reminder. Colleagues are introduced to the Values as part of our Bank wide induction where we discuss how the values were created in consultation with colleagues, how they guide our behaviours day to day and how they align to the wider values of the co-operative movement.

Our History

Co-operative values

We are a bank built on co-operative values

The Co-operative Bank was born from the co-operative movement over 150 years ago. The co-operative values on which the movement was founded are still important to us today; they are more than the foundations of the bank, they are what brings us together – colleagues, customers, the businesses who bank with us, the charities we support and the campaigns we stand for.

We operate under both the values and the ethics of the co-operative movement. These values also form the basis of our colleague values, which guide how we work. As a bank owned by a mutual organisation, demonstrating how we align to these values and how they guide us allows us to continue to use our co-operative name. We measure and report on this on a quarterly basis to Co-operatives UK, the central membership organisation for co-operative enterprises throughout the UK.



Our Policies

Documents and external references

Unlike a lot of businesses, we haven't just developed an ethical approach — we've had one from the very start. And our policies are key in helping us make sure that remains at the heart of everything we do.

Our policies are how we protect and support our colleagues, our customers, and the world around us.

Visit Our Policies page



ESG Reporting and Verification

Sustainability Report 2024

Each year, the Bank publishes its Sustainability Report that highlights the progress made against key commitments such as reducing carbon emissions, supporting communities, and promoting our Values & Ethics throughout everything we do whilst also setting out future ambitions too. By combining data with real examples of how we support our Planet, People and Communities, we demonstrate the positive impact that the Bank is having and how we have embedded ESG into our long-term strategy.

External Assurance of our Ethical Credentials

In 2024, we commissioned SGS to undertake assurance of our Sustainability Report and provide commentary on materiality, inclusivity and responsiveness of the Bank's overall sustainability approach.

Their Assurance Statement can be found within our Sustainability Report.

Read more in our
Sustainability Report, p.48



Read our 2024 ESG
Datasheet



Financial Reporting

Annual Results and TCFD Reporting

Annual Report and Accounts

Our Annual Report and Accounts 2024 were published in March 2025 and detail The Co-operative Bank's financial results from 1 Jan 2024 – 31 Dec 2024.

2024 was a strong year with financial performance in line with expectations and significant progress made in simplifying the Bank's IT infrastructure, whilst continuing to deliver for customers. This was alongside taking the Bank back into mutual ownership with the completion of the acquisition by Coventry Building Society.

Climate-Related Financial Disclosures (CFD)

The Co-operative Bank has continued disclosing our climate-related commitments. We have not financed fossil fuel extraction, production or infrastructure since 1998 and one of the three pillars of our refreshed Ethical Policy is 'Planet'. Our climate-related financial disclosures demonstrate how we embed the four pillars; Governance, Risk Management, Strategy and Metrics & Targets, throughout the Bank from Board to branch in line with TCFD recommendations.

Read more in our 2024 Annual Report and Accounts



Annual Reports and Accounts

2024

The **co-operative** bank

Ethical then, now and **always**

Business highlights continued

Supporting our colleagues and customers

72%	43.2%
Positive colleague engagement in colleague survey	Percentage of senior roles held by women
2023: 76%	2023: 43.3%
4.1 (Great)	3.0 ¹
Trustpilot score	Complaints per 1,000 customers (H2 2024)
2023: 4.2	H2 2023: 3.6

Environmental, social and governance ("ESG") highlights

1,865.6	2,546.6	
Scope 1 and 2 emissions (location based) (tCO2e) ²	Scope 1 and 2 emissions (market based) (tCO2e) ²	
2023: 2,188.4	2023: 1,486.3	
Scope 1 and 2 emissions	Our Net Zero journey	
Location based emissions reduced by 14.8 % in 2024 compared to 2023. Market based emissions increased as we could not certify renewable energy for sites until Q4 2024.	Developed a Net Zero Transition Plan with key milestones to achieving Net Zero by 2050 (see pages 35 to 36 for more information).	
Leading ESG risk ratings maintained:		
11.2	AAA	1st decile (Prime)
Sustainalytics rating ³	MSCI rating	ISS rating
2023: 8.5	2023: AAA	2023: 1st decile

Recognised as 'Eco Provider' by Which? for second year running ⁴

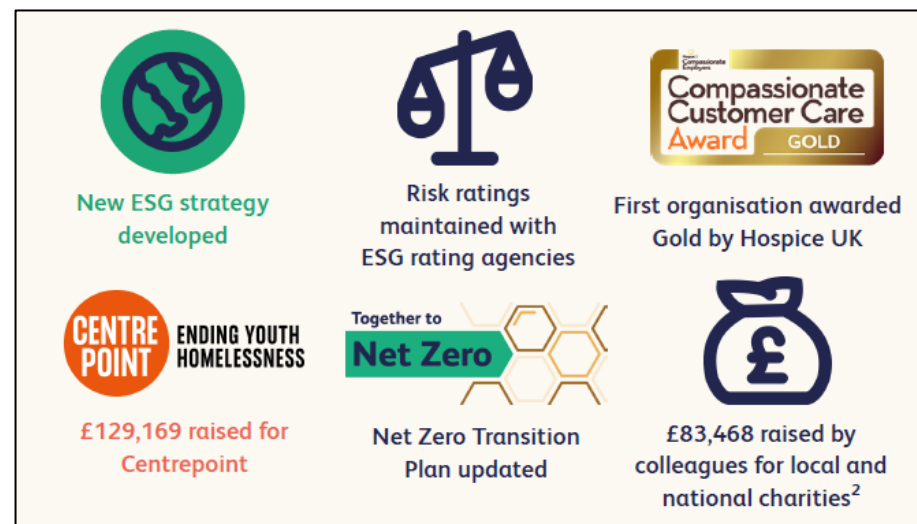
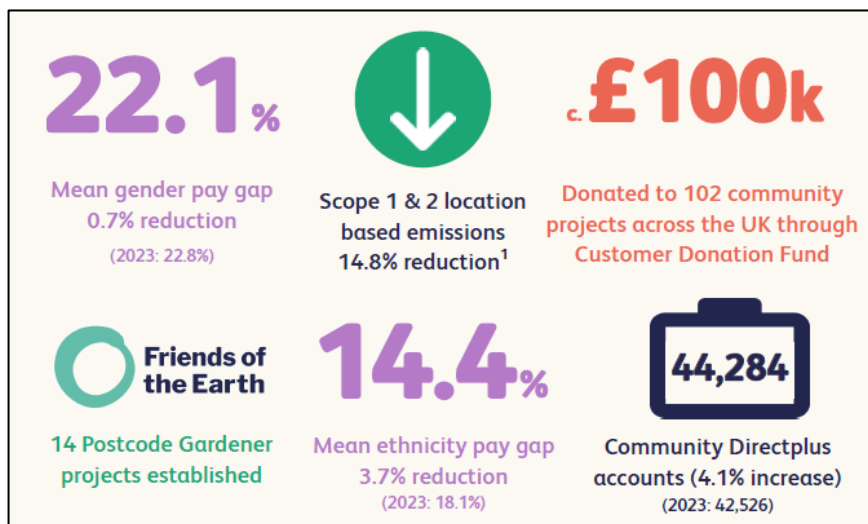
¹ The volume of regulated banking and credit complaints per 1,000 customers over a rolling 6 month period.
² Tonnes of carbon dioxide equivalent. Emissions data includes 0% estimates for 2024, 2023 full year scope 1, 2 and 3 emissions restated to include actual data for Q4 2023, which was previously estimated. See our Climate-related financial disclosures report on pages 28 to 40 for more information on our Greenhouse gas ("GHG") emissions data.
³ As of January 2025, The Co-operative Bank received an ESG Risk Rating of 11.2 from Morningstar Sustainalytics and was assessed to be at low risk of experiencing ESG issues. In no event should this Risk Rating be construed as investment advice or expert opinion as defined by the applicable legislation.
⁴ Which? Eco Provider for Current Accounts, October 2023 and 2024.



Our 2024 Highlights

Sustainability Report 2024

Alongside our annual financial results, The Co-operative Bank published its Sustainability Report on 03 March 2025. Our ESG and Sustainability highlights from 2024 are summarised below and in the report.



Read more in our Sustainability Report



Read our 2024 ESG Datasheet



Our Commitments

2025 Environmental, Social and Governance (ESG) targets

Our commitments for 2025 are set out in the tables below. Following the acquisition of the Bank by Coventry Building Society, we will look to align our approach regarding long-term ESG commitments across the wider group, and as we develop this approach, the targets below are subject to change.

Our Environmental Commitments

We will reduce scope 1 & 2 emissions in line with our Net Zero Transition Plan, by reducing energy consumption through optimising energy use across our branches and offices.

Scope 1, 2 and 3: We will begin to implement our internal Net Zero Transition Plan developed in 2024, which outlines a pathway to Net Zero Greenhouse Gas Emissions that delivers real economy decarbonisation in line with our Net Zero commitments and Just Transition principles (which you can read about on pages 10 to 11 of our Sustainability Report).

We will review our product and propositions to align these to our internal Net Zero Transition Plan in light of the acquisition of the Bank, and to ensure they support our customers in their decarbonisation journey and address our mortgage portfolio emissions (Scope 3 Category 15 – Financed Emissions) directly.

In 2025, we will positively impact biodiversity in over 400 spaces across 17 sites, meaning that with our help over 650 spaces across England and Wales will have been greened since 2023. We'll do this with our partner, Friends of the Earth, by funding Postcode Gardeners who will engage with over 1,500 community members and more than 90 community groups to transform the spaces.

Our Social Commitments

We are championing equality for all by campaigning with our partners on the causes that matter most to our customers: with our partners we'll expose the human rights crisis that is unfolding in the UK; raise awareness of domestic and economic abuse; work to secure a future for hospice care and we'll help to end youth homelessness, starting in our hometown of Manchester.

We will continue to give back to our communities by providing charities and community groups over 1,000 days of support from colleagues through our volunteering programme.

Our Governance Commitments

The Co-operative Bank Charitable Fund will commit a portion of underlying Bank profits to continue driving positive social and environmental change, whilst responding to the needs of our communities.

In 2025, we will continue to implement our new EDI strategy and will measure a wider set of metrics on EDI reporting in alignment with the wider Coventry Building Society group. In 2025, we will aim to keep at least 40% of senior positions filled by women and will aspire to achieve 45% as part of our commitments to the Women in Finance charter.

To continue embedding our new ESG strategy and to help motivate and empower colleagues with a clear sense of direction, all colleagues will have at least one ESG related objective for 2025. This further reinforces colleagues' commitment to our customer-led Ethical Policy after we introduced mandatory ESG objectives in 2024.

Environment

How we protect the planet

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Our Environmental and Biodiversity Policy

Environmental Management System

Environmental and Biodiversity Policy

The Co-operative Bank is committed to acting in a way that minimises its impact on the environment. As part of its Environmental and Biodiversity Policy, The Co-operative Bank has committed to comply with all relevant environmental legislation, prevent pollution and minimise the use of natural resources. This commitment resonates in the Bank's engagement with its supply chain, including the requirement for fair trade and FSC/PEFC product specification, all aspects of its operation, and engagement with customers and society.

Read our Environmental and Biodiversity Policy here



The Bank's environmental impacts are managed and mitigated against through the following processes and practices:

- Our Sustainable Procurement and Supplier Policy, which dictates the environmental aspects of the procurement process
- Our continued commitment to **Zero Waste to Landfill**, which ensures that the Bank does not send any operational waste to landfill. We also work continuously to increase the proportion of waste that we recycle
- Our **commitment to align to Net Zero by 2050**. Delivery of this target includes reduction in energy consumption by increasing energy efficiency and optimisation of Bank infrastructure to ensure alignment to Net Zero.
- Our campaigns to bring about positive change for the environment, such as the work with Zero Hour to support the Climate and Nature Bill.
- Supporting our customers to make sustainable choices via our green product offerings.
- Supporting industry wide initiatives such as the UN Environment Programme Finance Initiative Principles for Responsible Banking.
- Taking action to reduce our environmental impact and **offsetting** our operational carbon emissions plus an additional 10 %. This means that The Co-operative Bank is 'beyond carbon neutral'.
- Supporting environmental projects around the world through our carbon offsetting payments, in partnership with our carbon offsetting partner
- Our colleagues regularly use their **volunteering** time to support local environmental projects, including beach cleans and tree planting.

Net Zero GHG Reduction and Pathway

Scope 1, 2 and 3 Emissions, Carbon Intensity and Energy Usage

The Bank previously committed to reducing scope 1 & 2 emissions by 90 % by 2030, and to transitioning our Scope 3 mortgage lending portfolios to align to Net Zero by 2050 at the latest. As part of ongoing Net Zero Transition Planning, new near-term targets will be set at a group level, following the acquisition of The Co-operative Bank by Coventry Building Society.

In 2024, the Bank has continued to develop its internal transition plans to outline how these targets will be achieved. Throughout 2025, the Bank will look to review its product offering to support customers with reducing the carbon emissions associated with their homes, refining and improving data collection methodologies to enhance accuracy, continue to embed the governance in regard to achieving Net Zero targets, and continue to explore partnerships to amplify the impact of the Bank's stance on required activity to deliver its Net Zero targets.

Net Zero Calculations and Reduction Targets

In 2025, we continued to report our carbon emissions and carbon intensity metrics across all three scopes in their entirety. This includes Mortgage Portfolio Building Intensity (kgCO₂e/m²), Carbon Intensity (kgCO₂e/FTE), Carbon Intensity (kgCO₂e/£Revenue) and Energy Intensity (kgCO₂e/kWh). We comply with Streamlined Energy and Carbon Reporting requirements.

Read more in our
Sustainability Report



Net Zero GHG Reduction and Pathway

Water Efficiency & Emissions

In 2024, we have taken actions to obtain water usage data from a third party supplier. Going forward we will:

- Explore automatic meter readers on our water meters to improve the accuracy of water usage data;
- Use the usage data to explore options for water efficiency actions.

The Co-operative Bank Water Data;

	2023	2024
Usage (Cu meters)	11,904	11,353
Waste (Cu meters)	11,308	10,785

*We unfortunately experienced billing issues for large parts of 2024 which has affected the accuracy of our usage data meaning weighted estimates have been made across some Bank locations.

Sustainable Procurement

Our Supplier Policy and processes

As a business, we need to ensure that we behave ethically not only in the direct impact of our activities, but also indirectly through our supplier relationships. Therefore we make the following commitments as part of our Ethical Policy:

- We assess whether the operations of suppliers directly engaged by The Co-operative Bank are consistent with our Sustainable Procurement and Supplier Policy, which reflects our Ethical Policy.
- We aim to work with our suppliers to manage The Co-operative Bank's own environmental impact and support our policy of being beyond carbon neutral. In particular, we seek to:
 - Use renewable energy and manage our energy efficiently.
 - Reduce our reliance on fossil fuels.
 - Reduce our reliance on chemicals that persist in the environment and have the potential to harm health.
 - Embrace natural products and services.
 - Minimise waste through recycling and other sustainable waste management practices.

The process in summary:

- As part of the Banks Third Party Risk Management (TPRM) Operating Model, all new services (and at point of renewal) are assessed for materiality and inherent risk (M&IRA) against determined risk policy domains. Depending on the classification, the Bank completes additional governance requirements such as: performance reviews, business continuity plans & exit plans. The documentation identifies geographical location of where the service is performed including sub-contractors; people risk such as TUPE & training.
- If a supplier does not meet the Banks appetite then the escalation process is followed and alternative providers where required are to be sourced. For our key suppliers c70 we ask at Governance & Control meetings to attest that there are no changes to their responses and if there are any changes the supplier must notify the Bank.

Read our full Sustainable
Procurement and Supplier Policy here

Sustainable Procurement

Ongoing monitoring

The process in summary:

The bank has an ethical policy in place and a supporting question within our Supplier Due Diligence Questionnaire which covers:

- Human rights and equality
- Economic and social development in Britain
- Protecting the environment
- Supporting international development
- Protecting animal welfare
- Social Responsibility – such as expecting our suppliers not to engage in or support the use of child labour, and to provide consideration to young persons aged 15 to 18 in respect of their hours of work and safety

Living Conditions, Human Rights and Equality

The SPSP states that we expect our suppliers to provide wages for a standard working week that meet at least the legal or industry minimum standard, whichever is the higher, and are sufficient to meet basic worker needs and provide some discretionary income.

Here are a few specific questions from our SPSP questionnaire to demonstrate how we apply our policy to ALL new suppliers:

- *Do you have policies in place to protect the rights of all employees, customers and other stakeholders?*
- *Do you pay your employees the Real Living Wage as specified by the Living Wage Foundation: www.livingwage.org.uk*
- *Do you have policies in place that provide support and assistance for your employees, such as family friendly policies, work life balance policies?*
- *Do you implement the basic labour rights as set out in the Fundamental UN International Labour Organisation Conventions?*

Read our full Sustainable
Procurement and Supplier Policy [here](#)

Sustainable Procurement

Ongoing monitoring

- The Bank's Third Party Risk Management (TPRM) Operating Model outlines the end to end Procurement lifecycle, which includes, planning and selecting a third party provider through to exit. The TPRM Operating Model ensures the Bank consistently manages its third party relationships in line with risk appetite, legal and regulatory obligations.;
- All third party arrangements are assessed and classified by materiality and potential risk exposure level. Where a material or outsourced arrangement has been identified, a detailed risk assessment is conducted prior to contract signature and on an annual basis or as a result of a material change to the services provided thereafter. The Materiality & Inherent Risk Assessment (M&IRA) captures details relating to the supplier and contract which include but are not limited to the below, services provided by the third party;
 - Geographical location including Cloud arrangements, Size, 4th / 5th party relationships, Substitutability to support, Exit and if the services are critical in resolution or support one of the Bank's Important Business Services (IBS)
- Due diligence is completed for all third party suppliers at the point of on boarding, with ongoing monitoring conducted throughout the relationship at an agreed frequency relevant to the supplier risk classification and aligned to supplier compliance obligations. The due diligence questionnaire and risk assessment are aligned to the below risk domains:
 - Fraud, AML & Geographical location
 - People
 - Information Security
 - Financial
 - Business Continuity & Exit
 - Concentration
 - Values & Ethics
 - Delivery & Operational
 - Consumer Duty
 - Regulatory & Legal
- As part of this the Bank has set thresholds in line with regulatory requirements and has metrics in place to monitor concentration risk under the following focus areas:
 - Concentration risks from multiple engagements with the same third party;
 - Risk arising from third party arrangements that are difficult or impossible to substitute;
 - Risk arising from multitude of arrangements in the same geographic jurisdiction or region;
 - Risk of fourth party/supply chain dependencies.

[Read our full Sustainable Procurement and Supplier Policy here](#)

Sustainable Procurement

Ongoing monitoring

- To monitor and mitigate risk, third party assurance is undertaken by subject matter experts. Where suppliers operate on Bank systems, or vice versa, enhanced controls exist in relation to assurance with ongoing attestation controls and monitoring of system and operational performance. In addition, for material and / or outsourced suppliers monitoring exists in the form of financial due diligence checks and performance management framework.
- Enhanced assurance is in place for Business Continuity and Exit Planning to ensure continuation of service in the event of an unplanned disruption, which is exercised via extreme but plausible scenario testing in line with the annual schedule. Additionally, off-site and on-site reviews take place by the Banks Cyber Team aligned to risk profile, with design effectiveness testing performed across a multitude of topics. Assurance outputs are reported as a consolidated output at the Procurement Forum, with defined triggers in place to execute audit rights if required. The Bank may also execute additional Assurance, post outcomes of the Due Diligence Questionnaire.
- Adherence to the TPRM Operating Model is monitored via monthly Procurement Forum governance, with escalation via the Operational, Compliance & Financial Crime Risk Oversight Committee (OCROC). Any areas of non-compliance are reported to the forum and escalated appropriately, with issues managed in line with the Bank's Risk Management Framework (RMF). The Bank's 2LoD and Internal Audit function will assess supplier management in line with their annual schedule, to ensure policy adherence and effective risk management. Both functions attend the Procurement Forum to provide independent oversight of non-compliance and remediation actions.
- The Bank's confidential and whistleblowing helplines are available to third party suppliers.
- Throughout 2023 / 24 a training programme was rolled out by Procurement, which included training colleagues on the procure to pay process and TPRM Operating Model. On the Bank's intranet, we hold "how to guides" and best practice guidance. In 2025 this module is being refreshed to issue to the Group in 2026, this will also include supporting key procedure training documentation.
- The Bank Third Party Supplier Risk Policy; Third Party Control Standard and Sustainable Procurement and Supplier Policy (SPSP) are reviewed annually and approved through Governance.

[Read our full Sustainable Procurement and Supplier Policy here](#)

Responsible Asset Management

Responsible Investing and Green Financing

Treasury implemented a counterparty V&E screen in H1 2020 to supplement the Supplier screening policy (“Sustainable Procurement Supplier Policy“ SPSP) already in place. This exercise takes place on an annual basis.

The framework ensures the Treasury function:

- Does not execute transactions with banks controlled by oppressive government regimes
- Does not transact with counterparties that take an irresponsible Taxation approach*.
- Does not transact with counterparties with reputational concerns that conflict with the Bank’s Ethical Policy*.

**Unless there is an exceptional Treasury business need and this is approved by the CFO.*

Responsible Investment Policy

During 2021, Treasury introduced an ESG framework for investments made for the Bank’s liquidity portfolio. Sustainability ESG Risk Ratings are monitored on an on-going basis and ahead of any new investments. Entities with a High or Severe Risk Rating are excluded for front book investment. The policy is subject to annual review and approval at the Bank’s Asset & Liability Committee.

Green, Social and Sustainability Financing Framework

In March 2022, the Bank announced its introduction of a Green, Social and Sustainability Financing Framework. The Framework enables The Co-operative Bank to issue green, social and sustainability debt instruments to facilitate the funding of assets with environmental or social benefits that directly contribute to the United Nations Sustainable Development Goals (“UN SDGs”) . It also provides a transparent set of criteria to bring positive social benefits, transition to a low carbon economy and support our purpose to make a positive difference to the lives of its customers and communities. The Co-operative Bank will allocate the proceeds of its green, social and sustainability debt instruments to Eligible Green Assets and Eligible Social Assets (together referred to as “Eligible Assets”) as defined within the Use of Proceeds section of the Framework.

Find out more about the
framework here

Green Financing

GSS Financing Framework and Green Bond Proceed Allocations

Total Green Bond Issuances Outstanding - £850m

As of 31 December 2024, The Co-operative Bank had issued £850m notional of Green Bonds.

Further to the inaugural Green £250m 5NC4 HoldCo Senior bond issued April 2022, the Bank, through The Co-operative Bank Holdings Plc, has now issued a further 3 Green bonds, a £200m 5NC4 HoldCo Senior bond issued May 2023, a £200m 10.5NC5.5 Tier 2 bond issued November 2023 and finally a £200m 4NC3 Senior HoldCo issuance in September 2024.

Green Bond Allocation: Summary (as at 31 December 2024)

The GSS Financing Framework stipulates Bank can select Eligible Assets originated up to 24 months prior to the respective green, social or sustainability debt issuance, therefore the 2024 Allocation and Impact Report confirms that in total, since 6th April 2020 (2yrs prior to the inaugural green bond issuance) £1.54bn of eligible green residential mortgage assets (assets which had an Energy Performance Certificate rating of A or B) have been originated up to 31 December 2024.

The Bank's latest Allocation and Impact Report confirms that a total of £334m of eligible green assets with a valid EPC at completion were completed in 2024.

Given The Co-operative Bank has, in aggregate, £850m of green financing instruments outstanding and reports using the portfolio approach, all four green bonds are fully (100 %) allocated.

[Read our Green Bond Allocation Impact Report for more information](#)

[Read our Impact Report Second Party Opinion here](#)

Guiding customers to become sustainable

Customer initiatives

Renewable Energy Funding Scheme (REFS)

With our Renewable Energy Funding Scheme (REFS), SME customers can borrow up to 100 % of the cost of investment in renewable energy technologies to help improve the sustainability and energy efficiency of their business. Examples of how this funding could be invested are:

- ✓ Relocating to energy-efficient premises
- ✓ Changing to an energy-efficient boiler
- ✓ Improving your insulation
- ✓ Introducing recycling schemes
- ✓ Investing in electric vehicles
- ✓ Installing solar power
- ✓ Changing to LED lighting
- ✓ Other renewable energy projects

REFS was launched in 2022 as is available to all our SME customers, subject to application and credit assessment.

[Find out more about REFS here](#)

Zellar platform

zellar

In July 2022, the Bank launched a new partnership with Zellar, a digital sustainability service which helps businesses to measure the environmental impact of their business, build action plans to improve this and access a marketplace of green services. Zellar can help customers to:

- ✓ Make sustainability simple
- ✓ Accelerate net zero goals
- ✓ Save money and time
- ✓ Enhance reputation as a sustainable business
- ✓ Give a business a competitive edge
- ✓ Improve community and environmental impact

[Find out more about Zellar here](#)

In 2024, Zellar helped over 94 SMEs develop a sustainability action plan which enabled clients to save 36 tonnes in CO2, and identify energy bill savings of £34,000.

Green additional borrowing

In 2022, the Bank took its first step in to green mortgage lending by launching a 'green' further advance mortgage product range aimed at existing mortgage customers wanting to reduce their home's carbon footprint and making energy efficient improvements.

In partnership with the Energy Saving Trust, the Energy Saving Home Improvement Tool offers customers help understand the energy performance rating of their home and what measures can help reduce energy bills, carbon emissions and improve their EPC rating.

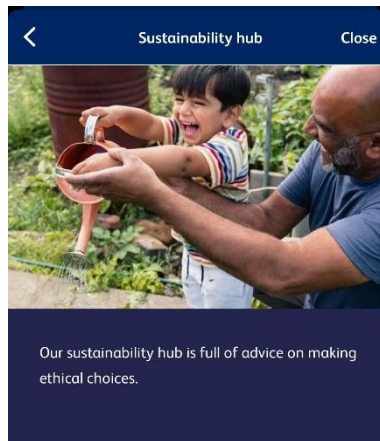


[Find out more about our Energy Saving Home Improvement Tool here](#)

Guiding customers to become sustainable

Our Sustainability Hubs

- Our Sustainability Hubs are dedicated spaces within our mobile banking apps, as well as on the Retail and business banking websites.
- The hub encourages customers to educate themselves on how they can live more sustainably in their day-to-day lives, providing information on how we as a Bank are living up to our own commitments.
- The Home improvement tool powered by Energy Saving Trust, is widely signposted to retail customers, to better understand how they can reduce their home energy consumption.
- The Sustainability Hubs provide an important vehicle for communicating with our customers on these topics, encouraging them to do their bit to protect the planet whilst also holding ourselves accountable as a business.



We're always looking for ways to help our customers and work on the things that matter to them the most. We've remained committed to protecting the environment for over 30 years — and we're not stopping any time soon.

Filter by category

Trending

Advice



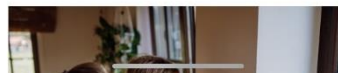
How to save energy throughout your day

Making changes to your daily routine can make a big difference to your energy consumption and bills.

Find out how you can save energy from morning until night.

[Read more about How to save energy throughout your day.](#)

29 May 2025 3 min read



Sustainability Hub

Need advice on making the right ethical choices? Our Sustainability Hub is a great place to start.

For over 30 years, our Ethical Policy has included a commitment to protecting the environment and we want to encourage you to join us in caring for our planet. The Sustainability Hub is your gateway to the products and services, advice and guidance that's available from the original ethical bank to help you on your sustainability journey.

Build a personalised Energy Saving Improvement Plan

We've worked with the Energy Saving Trust (EST) to deliver a tool that creates a personalised plan for you to save on your energy costs.

[Find out more about how this tool works](#)



More sustainability articles



Business Sustainability Hub

Need advice on making the right ethical choices? Our Sustainability Hub is a great place to start.

For over 30 years, our Ethical Policy has included a commitment to protecting the environment and we want to encourage you and your business to join us in caring for our planet. The Sustainability Hub is your gateway to the products and services, advice and guidance that's available from the original ethical bank to help you on your sustainability journey.

Get your business to net zero faster with Zellar

A software platform for medium-sized businesses to measure, manage and improve their sustainability journey in one place.

[Learn more about Zellar](#)



Social

How we support our colleagues and communities

Our Ethical Workplace and Culture

Reflecting our co-operative values and ethics

We are committed to creating an ethical workplace by:

- As a minimum, paying our colleagues the Real Living Wage, and not just the minimum as required by the government.
- Applying policies for reasonable adjustments, flexible working and leave options to support colleagues through difficult life changes and events.
- Recognising the right of our employees to freedom of association and welcoming trade union membership.
- Valuing the benefit of working closely with our trade union to ensure the voice of the colleague is heard.
- Ensuring pay and rewards for all colleagues, including executives, is fair, responsible and clearly linked to achievable individual and company performance including, the creation of sustainable value for all stakeholders.
- Ensuring that executive remuneration is linked to the delivery of our environmental, social and governance commitments.
- Prioritising our colleagues mental and physical health by providing training, support and resources as well as fostering a safe environment to be open about their needs.

See our Ethical Policy
Page 14



Read our Freedom of
Association Policy



We are committed to ensuring that values and ethics are embedded in our workplace culture by:

- Ensuring that the workplace values which govern our employees behaviour are aligned with our Ethical Policy and co-operative values.
- Ensuring that values and ethics are part of our mandatory code of conduct and that colleagues receive regular training on them.
- Regularly reviewing our policies and practices with a progressive mindset, ensuring they are underpinned by our values and ethics, and meet all legislative and regulatory requirements. Many of our policies include enhanced provisions where appropriate and are in line with our colleagues focus.

We promote equality of opportunity and aim to create a culture and environment that attracts and retains a workforce that is representative of our society:

- We support our colleague-led inclusion networks, helping them to drive social and cultural change internally and externally.
- We demonstrate our commitment to being an inclusive employer through taking part in and/or communicating our commitment to local and national inclusion initiatives.
- We operate a fair recruitment process that seeks to attract candidates from diverse backgrounds as well as endeavouring to work towards a selection processes free from bias.
- We will monitor and address diversity related pay gaps as appropriate.

Evidence of these commitments in action can be found in our latest Sustainability Report.

See our Sustainability
Report 2024



Building a high performance culture

Supporting our colleagues

Our stated purpose is to build a high-performing culture, underpinned by our values and ethics, ensuring our people recognise the vital role that they play in supporting others, driving business performance and that they have a clear understanding of the impact they've made.



- **Colleague Value Proposition** – supports **work- life balance, wellbeing** and **career development**.
- Our total reward package offers an **attractive range of benefits**, time off work options and **family friendly** policies and support.



- **Recruitment** - brand and V&E is our **Unique Selling Point** to attract, investing in early careers, **graduates, apprenticeships and placements**.
- **Retention** - by providing challenging job roles that give **opportunity to flourish**.



- **High-performing workforce** – We invest in **leaders** to build high performing remote teams. **Focus on results and delivery**, rather than presentism.
- **Scorecards remain integral** to all we do.



- **Technology** - deliver cloud based, mobile enabled technology to **digitise people processes**.
- Give colleagues & leaders the tools & freedom **to do the job by self-service**.

Employer Accreditations

Evidencing our commitments to colleagues

Greater Manchester Good Employment Charter

The Bank was the first Financial Services organisation to **gain membership status of the Greater Manchester Good Employment Charter**. We have achieved membership through our *'commitment to putting good employment into action and being exemplars of employment excellence, even through these challenging times.'*

The aim of the Good Employment Charter is to improve employment standards across the North West region and contribute towards a thriving and productive economy, with members like us committed to paying the real living wage, enabling flexible working and supporting the health and wellbeing of colleagues, amongst other things.

Through our membership of the Good Employment Charter, we have an opportunity to reinforce our position as a major values and ethics led employer in the North West and demonstrate our continued commitment to our colleagues, our customers and our communities.

Our support of the Charter is further demonstrated by one of our Senior People Business Partners sitting on the Charter Programme Board. The prime purpose of the Programme Board is to “strategically champion Good Employment generally and drive the Charter forward to deliver the outcomes and benefits for all employers across Greater Manchester, and to coordinate and govern the resources across the programme”.

London Good Work Standard

The Bank is recognised by the Mayor of London as a **Good Work Standard employer**. This recognition demonstrates our commitment to our People. It also reflects the many ways in which we are striving for the best working conditions for our employees.

Additional accreditations including Disability Confident Employers, HMT Women in Finance and Race at Work charter are detailed on page 44.



[View the list of Good Employment Charter members](#) >



[Visit the Good Work Standard website](#) >

Health and Safety

Our commitments to customers and colleagues

At The Co-operative Bank, we believe that excellence in the management of health and safety is an essential element within our business activities. Ensuring the health, safety and wellbeing of all colleagues, customers, contractors, visitors and others who are in any way affected by the undertakings of our Bank is incredibly important to us and the Board of Directors and the Executive Committee are committed to this aim.

From a legal perspective, we are committed to ensuring that we comply with all relevant health and safety legislation. Where it is reasonably practicable to do so, we will strive to go beyond the requirements of legislation, with the aim of achieving best practice where possible. Objectives and targets will be set and reviewed at least annually to demonstrate this intention is being strived for and achieved.

We also aim to develop a culture where continuous improvement in health and safety performance is integral to all of our commercial activities. We strive to create a working environment where accidents are not expected to occur, and where health and safety and productivity are given an equal priority.

All colleagues are reminded of their personal responsibilities in respect of health and safety to themselves and others who may be affected, and the need to co-operate with the Bank. We expect all colleagues to constructively challenge unsafe behaviours when they occur. Health and safety is regarded as an integral part of every colleague's duties. An appropriate level of resources and specialist support will be maintained to enable individuals to discharge their duties properly.

[Read our Health and Safety Statement of Intent here](#)



Health, Safety and Physical Security



This Bank's Health and Safety Policy Statement sets out the overall vision of the Bank to meet its legal obligations by:

- Ensuring appropriate health and safety advice and guidance is provided
- Providing information and training via our e learning training programme and face to face training where required
- Consulting our colleagues on matters relating to health and safety
- Ensuring appropriate workplace facilities are in place
- Providing first aid at work
- Ensuring there is an appropriate accident, incident and near miss reporting system in place
- Preparing and providing appropriate risk assessments and understanding and acting on control measures/actions which arise

Colleague Learning and Mandatory Training

Our colleague offering

We offer a mix of on-the-job and formal training, with role-specific inductions and upskill training in our high volume areas.

Our **Bank-wide induction session** provides great networking opportunities and a chance to meet members of our executive team, as well as showcasing our history and heritage; values, behaviours and ethics; Bank strategy and scorecard; our union partners and our customer and colleague propositions.

The Bank also provides **technical training** for new and upskilling colleagues in our customer facing areas to ensure they have the right skills and knowledge to support customers and their banking needs. This is aligned to a training and competency framework to ensure that we are following regulatory and business processes and also following the principles of the Consumer Duty. Each induction is a minimum of 5 days and we have regular upskill activity to develop colleagues in their role.

Our **My Development platform** is available to colleagues to access anytime for self directed development. This offers a multitude of training resources that are accessible by all colleagues and can be selected based on personal development wants and needs.

We have a **robust risk and mandatory training programme** that provides colleagues with core knowledge training which all colleagues must undertake. This training demonstrates to our regulators that as a business we have a robust framework and process in place that allows users to have a sufficient understanding around the financial sector we operate in and the principles that govern us. This is achieved through a curriculum of mandatory training modules that ensures our colleagues maintain a core knowledge and understanding that all colleagues must complete at the beginning of their employment and then on an annual basis thereafter or as required. There are 13 modules covering key topics from Money Laundering and Fraud to Equality, Diversity and Inclusion. We also provide a focused ESG and Sustainability course for all colleagues. Annual refresher training includes our Code of Conduct, which defines how we behave in line with our Ethical Policy and guiding values, how we deliver the right customer outcomes and how we comply with regulatory requirements.

Training Hours

In 2024, a total of 120,301 hours of training was undertaken across the Bank by colleagues. This amounts on average to 39.9 hours per colleague across the year. Training took place across a range of areas including:

- 20 % off the job training to support apprentices to get their qualifications equating to 21,936 apprenticeship training hours (approximately 130 colleagues are taking part in apprenticeships in H1 2024)
- Webinars on ESG and net zero, stress management, neurodiversity and financial wellbeing.
- Leadership development sessions including managing wellbeing, people policies, performance and talent management.
- Role specific customer service training and role specific upskilling
- Mandatory training
- Role specific mandatory training
- Talent Succession Programme
- Health and Safety Training including First Aid and Mental Health First Aider training
- Personal development through our online tool My Development

*Full list of Bank-wide mandatory training modules: Anti Money Laundering; Conduct Risk and Consumer Duty; Data Protection Awareness, Display Screen Equipment (DSE), DSE Assessment; Fire Safety; Fraud Awareness; Equality, Diversity and Inclusion, Cyber Security; Risk Management Framework; Code of Conduct ; The Conduct Rules; Environmental, Social and Governance and Sustainability. For 2025 a further module will be added: Supporting Vulnerable Customers.

Colleague Learning and Mandatory Training

Our colleague offering

As part of our internal training process, Bank employees must complete a series of training modules each year. Each module consists of learning material followed by a test which must be passed in order to complete the training. All colleagues complete 13 modules each year, (up to 45 mins per module) equating to 9 hours 45 minutes per person/per year. Our target for completion of mandatory training is 100 % of colleagues. Below are some examples of our key mandatory training modules

Responsible product offering and marketing training:

Training Module	Summary	2024 Employee Completion Rate
The Conduct Rules	This module helps colleagues to understand why we have the conduct rules, what they are and how their role relates to them. It covers conduct rule breaches how these are reported to the regulators. Case studies and scenarios are used to bring this to life and check understanding.	98.51 %
Conduct Risk	Helps colleagues to identify how they can contribute to mitigating conduct risk, ensuring they do not deliver poor outcomes or cause harm to customer. It details what to do if a colleague identifies something which may result in poor customer outcomes or harm for customers. Case studies and scenarios are used to demonstrate how to achieve good outcomes.	99 %
Code of Conduct	Provides colleagues an understanding of the purpose and scope for the Bank's Code of Conduct policies, guidance documents and support available. It details how to act in the Customer's and the bank's best interest, explaining their responsibilities to comply with the bank's Code of Conduct with reference to our ethical policy and values.	99 %

Regular training modules on data privacy management:

Training Module	Summary	2024 Employee Completion Rate
Data Protection Awareness	This module gives colleagues an understanding of personal data and how to process this alongside the data protection principles. It details their responsibilities in regards to data protection legislation and the rights that customers and colleagues have in respect of their personal data.	98.9 %
Cyber Security	Supports colleagues' ability to recognise why information security is critical to our business. It covers how and why information is classified, how to use email and the internet safely, how to follow network access procedures and details our physical security procedures. The module helps colleagues to recognise how and when to report actual or suspected data breaches.	99.27 %

Colleague Learning and Mandatory Training

Integrating Environmental, Social and Governance

In 2024, we made significant progress in integrating ESG into our ways of working.

ESG and Sustainability Training

- Introductory Training for new recruits: On recruitment to the Bank, each and every colleague receives a Welcome session, which includes training on ESG, Values and Ethics;
- Colleague ESG and Sustainability Training: 99.8 % of colleagues completed mandatory ESG and Sustainability training in 2024. Further training to embed ESG and Net Zero is planned to be completed in 2025.

Sustainability Performance Objectives – ESG Mandatory Objective

The Bank has committed to ensuring that: All colleagues will have at least one Environmental, Social and Governance related objective for 2025, helping to motivate and empower them to perform at their best, with a clear sense of direction in delivering against the ethical commitments in our customer-led Ethical Policy and ESG strategy.

Whilst the specific nature of the objectives are often different for each colleague and then differ further between departments, the Bank is led by an overall scorecard objective which continued to directly link executive remuneration to ESG-related objectives in 2024; these are reviewed on an annual basis but are often based upon achieving a set reduction in emissions such as those set within our ESG Commitments.

For ESG Commitments - see
page 16 of our 2024
Sustainability Report



Colleague Learning and Mandatory Training

Prioritising colleague education

- With so many roles, business areas, and specialisms across the Bank, it is not possible to take a one-size-fits-all approach. Our partnerships with educational institutions are an important way in which we can deliver further education for our colleagues, developing and delivering joint training programmes and courses. Each of our four partner providers offer **job-specific programmes** to new and existing colleagues across a range of areas and further information on each can be found by clicking on the logos.



- Workpays** - We've been working with Workpays since 2019. They're our main programme provider for our customer-facing business areas.
- Manchester Digital** - On boarded in 2023, Manchester Digital have developed a range of Level 4 programmes for software developers and business and data analysts.
- BPP** - Partnered since 2019, BPP are a private sector training partner with University status. They offer a wide range of programmes in non-customer facing areas, primarily at Level 4 and above.
- Manchester Metropolitan University (MMU)** – a partner since 2024, MMU provide our degree apprenticeship programme in L6 Digital Technology Solutions (Cyber pathway) and are an important outreach and community partner where we have a mutually beneficial strategic relationship outside of just apprenticeships.
- Colleagues at all levels have access to live lessons from leadership development specialists at Hult International Business School, as well as access to online content via their learning platform designed to support colleagues address their unique development needs.
- Entry Talent:** All Graduates complete apprenticeship training in a subject aligned to their chosen Graduate Programme. Apprenticeships range from Bachelor's degree equivalents to Master's degree equivalents in a variety of subjects, including professional courses via ICAEW, ACCA or CIMA, Applied Digital Technology Degree apprenticeship, MSc Applied Data Analytics, Financial Services Professional and Senior Compliance Risk Specialist.
- Colleagues also have opportunities to raise ad-hoc requests through our central Apprenticeships team. Governance exists to manage requests and oversight all apprenticeship activity, including supplier/learner management, exploring and on-boarding new suppliers (where appropriate).
- Latest UK Department for Education (DfE) data (March 2024) shows our achievement rates in colleague apprenticeships to be approximately 80 %, significantly **above the national average** of 60.5 % (2023/24 UK DfE preliminary data).

Internal Talent Development and Career Progression

Our talent development programmes

The Bank's Entry Talent (ET) Agenda is aligned to business strategy, developing key capabilities to meet the future resourcing needs for the Bank and establish a strong talent pipeline. To support the Bank in achieving its strategic objectives we create ET pipelines through a multi-channel approach which educates, develops and supports individuals to reach their potential.

Graduate programme

Accelerated leadership and technical development programme recruiting high calibre Graduates through small targeted external attraction and robust selection process. Developing leadership skills and technical knowledge across the wider Bank whilst completing a series of rotational placements and a relevant apprenticeship qualification. Designed to support talented graduates in reaching their full potential and ensuring the Bank is in the best position to build a strong talent pipeline of future leaders in specialist areas.

Degree Apprenticeships

New for 2025, we're offering our first-ever externally recruited degree apprenticeship pathway. The course – L6 Digital Technology Solutions (Cyber pathway) - is offered by our partner, Manchester Metropolitan University and will provide an opportunity to a new apprentice to complete their degree alongside work. The aim is to provide more opportunities in other areas in the coming years as degree apprenticeships hopefully, and expectedly, gain parity with traditional academic routes.

Industrial Placement Programme

Our 12 month placement programme allows undergraduates to gain vital experience by working on some of our biggest projects. Designed to enable colleagues to explore different opportunities and interests before returning to University the following year, with the aim of them re-joining post-University on our Graduate scheme.

Mentoring

The Bank offers a range of mentoring programmes for all colleagues to participate in as either mentors or mentees.

Bank wide mentoring programme: Our Bank-wide Mentoring programme offers all colleagues the opportunity to be a mentor and/or a mentee. Traditional mentoring usually involves a more senior person mentoring a more junior colleague, but we believe that anyone can be a Mentor; it's just about having some experience, skills or knowledge that you can share with others to support their development.

Career Progression/Talent Development mentoring: Colleagues on our Graduate programmes will be offered a mentor to support them through the duration of their programme.

Internal Talent Development and Career Progression

Succession and development

Succession Planning: In line with regulatory requirements, we have a strong succession plan for all critical roles across the Bank, striving for at least 2 emergency successors for every position, plus colleagues identified as 0-2 and 3-5 year successors for all. We continually evaluate and refine this plan gauging colleague readiness and implementing targeted development where required to eliminate gaps.

Talent Reviews: Regular local talent reviews supported by robust performance management processes ensure we are nurturing our internal talent pipeline and supporting colleague development and retention. This process feeds into our Executive Talent review cycles to highlight any gaps in skills, knowledge or behaviours.

Leadership Development: Internally focussed and facilitated leadership development offering, providing all colleagues with the opportunity to engage with personal and professional growth aiding career mobility within the Bank. Learning through live events facilitated by Senior Leader SMEs plus offline resources and content.

Growing our 2025 Leadership Pipeline: 2025 Entry Talent Programmes

- To enable the Bank to continue building and nurturing our talent pipeline and developing the key capabilities needed for the future, the Bank continues to take a multi channel entry talent approach enabling us to maximise attraction of high calibre talent and create different routes for graduates and students
- Our Graduate scheme, which is now in it's eleventh year, continues to provide a strong pipeline of future leaders with many of our Graduate alumni occupying a number of senior leadership roles.
- Our entry talent cohort for 2025 consists of eight new colleagues across Graduate, Placement and Degree Apprenticeship schemes – starting September 2025.

Individual training needs: All colleagues participate in the performance management cycle by attending bi-annual performance reviews at mid and end of year. In preparation for these reviews, colleagues have access to template performance packs and are actively encouraged to discuss their Personal Development Plans with their line managers to identify and action individual training needs.

Talent pipeline development strategy

Partnerships, Training, Graduate/apprenticeship programs

Support for degree programs and certifications:

- Partnership created and being further developed with Manchester Metropolitan University (MMU), with a key area of focus being the development of degree apprenticeship opportunities. First-ever degree apprentice joining Sept 2025. Ambition to use as a trial and widen offer on 2026 and beyond.

Graduate traineeship/apprenticeship program:

- Continued to offer entry talent programmes in 2025, even in light of changes and integration activity post acquisition by CBS - demonstrates keenness to stay in market and provide opportunities. Two Graduates, five industrial placement students and one degree apprentice in cohort joining Sept 2025. Apprenticeships continue to be offered to develop colleagues across the Bank, and in some cases recruit new colleagues, with programmes ranging from level 2 to level 7 and across multiple disciplines, programmes and functions. Approx. 45 active learners on programme at time of writing but approval has been given for a minimum of a further 55-60, which should take active apprenticeship learners back up to around 100 before the end of 2025 - there was a natural lull in activity due to acquisition/integration.

Partners with educational institutions to develop/deliver joint training programs for staff:

- We do partner with educational institutions such as apprenticeship/training providers, and MMU, to offer programmes to staff. We also partner with educational institutions as part of our wider Early Careers strategy - with partner schools, colleges and a university making up our network. We offer financial education, work experience and careers advice/opportunities to our partners, helping us to demonstrate our commitment to uplifting capability and closing skills gaps within our communities, whilst also providing a pipeline of local talent into the Bank. These partnerships, however, do not include development or delivery of any training programmes for staff.

External talent identification and on-boarding

Embedding diversity and inclusion in our hiring process

[Visit our Careers Portal](#) >

Our in-house Resourcing Team provide an expert service for the identification and on-boarding of external talent into our Bank. A key focus for the team is attracting and retaining colleagues that reflect the values and ethics which are so important to our customer base. The interaction with the resourcing team allows external talent to see our brand in action and get a real sense of our colleague value proposition.

It's vital that we are transparent with all candidates throughout the recruitment process. For each vacancy we create a tailored recruitment strategy plan which often include the use of video adverts to help provide an authentic view of the Bank and bring to life the key deliverables of each role. Hiring managers have a huge part to play and are fully supported to ensure we deliver an inclusive candidate experience.

We continually review and improve our candidate and hiring manager support packs to improve our candidate experience which includes video interviewing at Entry Talent levels to ensure bias is eliminated. It's very possible that our candidates are customers so it is imperative that they receive a great experience whether they are ultimately successful in securing the role or not.

We value the diversity of ideas that come with bringing external talent into the organisation and always looking for ways to enhance our offering. This year we have built our industrial year placements and are currently trialling degree apprenticeships.. We also hold Quarterly reviews of our attraction methods, team performance and by using market insights to ensure the experience we provide is always evolving.

The use of our inclusion partners below supports & ensures a diverse talent pool by: advertising directly to disabled and socially mobile applicants; understanding the diversity of the external market per role; writing inclusive job adverts and video interview technology has eliminated any bias from the recruitment process and ensure hiring decisions are focussed on aptitude and ability. This has also allowed us to use market insight to build out talent pools in under represented demographics.

Advertising

You'll find the below statement on every one of our job adverts:

"Our Bank is committed to continuing to create a diverse workforce and an inclusive environment where all colleagues can fulfil their potential. We welcome applications from talented individuals from all backgrounds and lifestyles who can work with us in maintaining a culture of belonging, where people are valued and respected."

If you require more information or this document in a different format, please contact careers@co-operativebank.co.uk



Level 2: Disability Confident
Employer - GOV.UK (www.gov.uk)



Labor Market Data and Talent
Analytics | Horsefly Analytics



Our Science | HireVue Online
Interviewing & Recruiting Platform



The Social Mobility
Foundation

People Metrics

Types of employment and colleague turnover

Our Executive Team receive monthly People Packs with an overview of key People Metrics for their areas including attrition, absence, headcount and FTE flow, performance metrics, salary metrics and structural overviews. The packs also support our management of key people risks and feed into the people sections of local and Bank-level risk forums and governance committees.

One metric which is monitored by our People team is the proportion of colleagues employed in regular and non-regular employment.

	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24
Total Active Headcount Payroll	2858	2904	3390	3420	3464	3447	3445	3381	3372	3351	3330	3298	3288	3270	3244	3242	3228	3192	3130	3038	3003	2970	2939	2905
Contractors	124	124	131	128	129	121	108	100	91	82	80	69	59	55	47	39	30	19	10	6	6	6	6	5
Temporary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total non perm	124	124	131	128	129	121	108	100	91	82	80	69	59	55	47	39	30	19	10	6	6	6	6	5

A key Bank-wide focus within our people metrics and people risk management is **colleague turnover and voluntary attrition features as a measure on our Bank-wide scorecard**.

Maintaining a healthy level of colleague turnover is essential to an organisation; too little and you risk stagnating, too much and you risk losing essential knowledge and skills. At The Co-operative Bank, we carefully monitor our turnover levels to ensure that we strike the right balance. We also endeavour to engage with our leavers to understand their reasons for leaving to help us shape our approach to supporting and retaining colleagues across the Bank.

Our FTE or headcount as at 31 Dec 2024 can be viewed in our annual reports and accounts:

Read page 84 of our 2024 Annual Report and Accounts >

Non-regular employment position: The Bank's recruitment strategy prioritises permanent hires, or fixed term contracts where the Bank employs individuals directly. The terms and conditions of FTCs are the same as those of permanent hires. We favour direct hiring of candidates and therefore have limited use of agencies. We have currently only 5 direct contractors with the Bank and these are in the CIO function of the Bank to support with specific activities.

Employee Turnover

The Employee Turnover Rate assesses the Bank's retention of permanent full-time and part-time employee retention. The below table represents the proportion of avoidable and total leavers across 2023 and 2024 compared to headcount. The difference between avoidable and total leavers includes turnover due to redundancies and retirement. Avoidable attrition decreased significantly in 2024 against 2023 totals.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2023 - Avoidable Turnover	12.18 %	12.08 %	11.80 %	12.69 %	12.57 %	12.44 %	12.30 %	12.63 %	12.61 %	12.53 %	12.64 %	12.44 %
2023 - Overall Turnover	19.73 %	19.16 %	18.36 %	18.04 %	17.59 %	17.43 %	17.17 %	17.93 %	18.03 %	17.73 %	17.56 %	17.40 %
2024 - Avoidable Turnover	9.49 %	8.78 %	8.94 %	9.84 %	9.96 %	9.56 %	9.83 %	9.88 %	9.97 %	10.10 %	10.07 %	9.93 %
2024 - Overall Turnover	14.96 %	12.81 %	14.57 %	14.90 %	14.97 %	15.54 %	17.15 %	19.94 %	19.70 %	19.55 %	18.83 %	18.49 %

Colleague Voice

Listening to and acting on feedback

We're committed to listening and acting on colleagues' feedback to improve the service we provide our customers and ensure we have an inclusive environment that supports our colleagues. Some of the ways we achieve this include:

- **Quarterly pulse surveys:** Run via our intranet, these surveys give colleagues the opportunity to provide anonymous and meaningful feedback on a regular basis, which is shared with the Executive Team and informs some of our colleague communications and engagement plans.
- **Colleague Co-operative Forum:** Our network of colleague representatives work together to '*help the Bank to understand and act on colleague sentiment and feedback, and further engage and support colleagues, to evolve our ethical workplace and culture*'. These reps work with local engagement ambassadors to support colleague engagement within business areas, ensuring that whilst we are all working hard we also enjoy our time at work. Trade Union reps are also invited to join this forum.
- **Roadshows and leader events:** Virtual roadshows and events at both a Bank-wide and local level give colleagues an open platform to hear updates from, and ask questions to, our senior leaders.
- **Team meetings and 121s:** All colleagues attend regular team meetings and 121s to discuss updates and give feedback for leaders to address.
- **Site Leads** – The role of the Site Leads are to be the eyes and ears of the site they're accountable for; continuing to have regular on-site presence to gauge how colleagues are feeling ; strengthen collaboration across teams - bringing teams together, understanding their needs, looking for improvements and driving positive change through campaigns the Bank is supporting.
- **Colleague inclusion networks:** Run by colleagues for colleagues, all of our inclusion networks look to offer support and drive forward our inclusion and diversity strategy, helping to raise and discuss topics that are important to members.
- **Colleague forums:** We launched two colleague forums, the Parents & Family Forum and the Carers Forum, to provide a safe space for colleagues to open up about their personal experiences and hear from others who may be experiencing similar issues to offer support and guidance.
- **The Buzz (Our colleague intranet page):** Blogs, comments and forum posts are regularly monitored by the Internal Communications Team and intranet editors who welcome feedback and respond as necessary. Intranet analytics give insight into how colleagues are feeling and what's important to them, helping to evolve our communications and engagement approach.
- **Annual Engagement Survey:** we undertook an engagement survey in December 2024 to assess how colleagues experience working at the Bank. Our results demonstrated strong engagement across 72 % of respondents, with engagement remaining high across all tenures. Our top three drives of engagement are 1) Feeling motivated to do the best job I can 2) Feeling a sense of accomplishment from what I do 3) Recommending the Bank as a great place to work.
- **Freedom of Association and Trades Union Recognition:** We recognise the right of our colleagues to freedom of association and we publicly share our Freedom of Association Policy on our website. We welcome colleagues to join a trade union if they wish and we work in close consultation with our recognised trade union Unite on proposals for change. We are proud to say a large proportion of colleagues at the Bank are members of Unite. We have a Recognition Agreement between Unite and the Bank detailing collective bargaining rights which cover the majority of colleagues at the Bank. We also work closely with the unite representatives at the Bank to proactively understand the interests and needs of members/colleagues.
- **Exec visits:** Our Exec Team are committed to visiting our major occupancy sites and branches, where they hold Q&A sessions and meet teams in small groups to provide colleagues with the opportunity to ask questions and raise concerns in person. Members of our Board have also visited sites and will continue to do so.

2024 Engagement Survey Highlights

We achieved an overall Engagement Score of 72%

74% of colleagues feel motivated to do the best job they can

73% of colleagues feel a sense of accomplishment from what they do

71% of colleagues would recommend the Bank as a great place to work

Freedom of Association and Collective Bargaining

Unite the Union at The Co-operative Bank

Visit the Unite the Union website



Statement from our Union

"With a long history in the co-operative and labour movements and with our commitment to the principles and ethics of co-operative business, Unite the Union has been long welcomed into The Co-operative Bank as a key stakeholder. The Ethical Workplace and Culture Section of the Bank's Ethical Policy has been developed with Unite to reflect the ambition of the business to be the best employer that it can be, and to ensure that its employment policies and practices are intended to reflect that ambition.

Unite believes all aspects of working life should be the subject of discussion and agreement. We meet regularly with senior management, including the CEO, to consult and negotiate on a wide range of issues and policies, and to discuss matters of concern. We work closely with the HR Advisers and Business Partners on a daily basis to ensure our members are treated fairly and properly whilst at work, and to get the best possible outcomes for them.

The relationship between Unite and the Bank is regulated by a Recognition Agreement. This sets out how both parties will operate in relation to each other, what each will provide and what each can expect. The agreement provides for the presence of union representatives in the workplace, one full time rep for more involved issues as well as local reps, who are on hand to deal with more serious and involved issues.

Unite provides confidential assistance, advice and representation for members in formal meetings such as disciplinary, sickness absence, performance, grievance and appeals. All our reps receive a range of training from Unite and the senior reps also have a Diploma in Employment Law. Whilst we do have disagreements with the business on occasion, and we don't shy away from that, we're here to sort out problems, find solutions, enforce members rights, and ultimately make the Bank the best employer it can be.

Every year the union reps work on behalf of members on the annual pay negotiations. From start to finish, a full pay negotiation cycle takes approximately six months. We survey members to find out what they want, we research other pay deals across the finance sector and look at any terms and conditions changes that may need to be tabled. We then draft and agree a pay claim and request a range of data from HR so that we can assess the impact of any claim. Pay negotiations normally start once we have submitted a claim, and when they have reached a conclusion we hold a full reps meeting to decide on a recommendation. A ballot of members is then organised.

Of course, no business is static. Organisations change and evolve, and to facilitate that Unite and the Bank have negotiated an Organisation Change Agreement which lays out how changes affecting staff will be undertaken, including restructuring, redundancy terms, etc. Unite is always consulted in advance on restructures and reorganisations, so that we have a chance to understand the changes and challenge them where necessary. We then support members who are impacted, ensuring processes are followed properly, challenges investigated and redeployments offered where possible. Essentially, we do everything we can to make the process as pain free as possible for our members".

Union membership

- 100 % of eligible colleagues are covered by collective bargaining agreements. All Grade B, C and D colleagues, who make up 99.2 % of the colleague population are eligible. Colleague Grades range from Executive Grade through to Grade A, Grade B, Grade C and Grade D, in descending order of seniority.
- Membership of Unite at the Bank is 42 %, calculated by the number of members as a % of the Bank's eligible colleague population.
- The Co-operative Bank believes that trades unions make an important contribution to business and society as a whole. Every new employee of The Co-operative Bank is informed of their rights through the colleague induction process, within our Code of Conduct Policy and information is readily available to colleagues on our intranet site.

Read our Freedom of Association Policy



Colleague Wellbeing

Supporting colleague health and wellbeing

As a proud holder of a Compassionate Employer Silver Award from Hospice UK, colleague wellbeing is important to us and our focus is supporting colleague wellbeing in the workplace to enable them to thrive.

Policies – We offer a vast range of people policies to support colleagues wellbeing during different stages in their lives and promote our flexible working policy to improve work life balance, as well as hybrid working. Flexible working options include compressed hours – where colleagues can work their contractual hours over a shorter period of time than is standard. We actively listen to colleague needs and have introduced a menopause policy & pregnancy loss policy. Our flexible working policy is applicable from day 1 of employment and goes beyond the statutory requirements to offer this support to all colleagues.

Support – We offer a 24/7 EAP service to colleagues and eligible family members providing advice, support and unlimited mental health support. Through our Help@Hand app we also offer unlimited GP appointments, physio and medical 2nd opinions, in addition to one to one coaching with a Personal Trainer and Nutritionist. Wellbeing webinars are offered to colleagues on a range of wellbeing topics including resilience, financial wellbeing, sleep, neurodiversity. We work with our wellbeing provider, UNUM and our Occupational Health to support colleagues in work and absent from work to provide advice and guidance on reasonable adjustments and provide detailed return to work plans. Such adjustments may include changes to workload, duties, hours of work.

Mental Health is a continuous focus and celebrate Mental Health Awareness week with a range of activities, whilst regularly holding webinars for colleagues and Leaders, throughout the year on topics including building resilience, stress management. We also regularly raise awareness of mental health conditions and encourage colleagues to take steps to manage their mental wellbeing. This year we held Change Management webinars to support colleagues through organisational change and we hold managing workload sessions to help colleagues manage stress in the workplace. We promote an open culture and encourage colleagues to openly discuss their feelings, proactively identify any issues through a Stress Risk Assessment. We have offer Mental Health First Aiders who are available to support colleagues internally and utilise a range of support including Mental Health First Aiders in addition to mental health support through the Help@Hand app.

Colleague Wellbeing

Supporting colleague health and wellbeing

Listening to colleagues – We regularly monitor colleague wellbeing through our annual colleague survey and regular pulse surveys, and take pro-active action to address any workplace wellbeing issues. We promote wellbeing discussions during regular 121's to enable Leaders to provide support and necessary intervention.

Financial Wellbeing – As a Real Living Wage Employer, we continually review our reward package and offer colleagues salary advances, an income protection sickness scheme, a colleague retail discount platform and free sanitary products which are available at our main sites. We provide a range of resources to colleagues to manage this finances including webinars hosted by Citizens Advice.

Training and Development – We have an extensive learning offering to support colleague self development, including a leadership development programme which focuses on managing colleague wellbeing and a mentoring scheme for all colleagues.

Our inclusion networks – Our colleague networks, specifically our Access network spotlights a range of wellbeing topics, raising awareness and providing advice with colleagues sharing personal experiences and stories to help other colleagues. We also have Colleague Forums – Menopause Forum, Carers Forum and Working Parents Forum providing an opportunity for colleagues to support and connect with each other.

Communications – We communicate regularly about Wellbeing with monthly wellbeing blogs on different wellbeing and health topics, providing guidance and reminding colleagues of available support. Colleagues can access resources on our Wellbeing intranet site. We regularly encourage colleagues to talk about their mental health is advocated by our Executive through regular communications.

Volunteering – we offer colleagues two days volunteering per year to improve social wellbeing in the community.

Colleague Procedures

Communication of rights & Grievance Procedures

Communication of Rights

There are a number of ways in which the Bank facilitates trade union activity within the organisation:

1. Dedicated trade union pages on the Bank's intranet, which are used by the union to directly communicate with staff. The landing page definitively states that the Bank welcomes trade union membership:
 - "It really is in your best interests to join us at Unite at the Co-op Bank"
 - "We need to look after ourselves and each other. That can only be done collectively through a union - there really is strength in numbers. The Co-op Bank fully supports trade union membership."
2. Trade union information is **included in the Bank's welcome pack to new staff**, which includes its statement of support for trade union membership.
3. The Recognition and Facilities Agreement details the relationship between the business and the union, and outlines the responsibilities and facilities to be provided by each party – which includes the rights to organise, negotiate and consult. A new agreement was concluded in early 2025, was announced to staff and is freely available on the Bank's intranet.

Grievance Procedures

There are **three ways in which Bank staff can raise grievances internally**:

1. Via the established grievance procedure agreed with our trade union;
2. Via the Concern at Work Hotline directly to the Major Investigations Team, or;
3. With the Chair of the Bank's Audit Committee directly (details on the Bank's internal intranet).

If staff do not feel that they can raise matters internally, contact information for the Financial Conduct Authority and the Prudential Regulatory Authority is freely available on the Bank's intranet.

Equality, Diversity and Inclusion

Committed to co-operative values and ethics



We are proud of our diverse colleague community and our workplace culture, where colleagues are encouraged to bring their whole selves to work. This tone comes from the top with our Senior Leaders committing to sponsoring our colleague networks and the key role played by our Board level Values, Ethics and Nomination committee. Our Inclusion Strategy sets out that CEO, Andrea Melville has overall accountability for overseeing the adoption of the Bank's culture in the day-to-day management of the Bank and for the development of the firm's culture as a whole.

Our inclusion commitments include an absolute focus on equality for all, regardless of personal demographics. We are a Disability Confident certified (level 2) employer and our HMT Women in Finance and Race at Work Charter commitments underpin our gender and ethnicity focus. Since 2022, in addition to our Gender Pay Gap, we began publishing our Ethnicity Pay Gap in our annual Pay Gap Report.

The Co-operative Bank was one of the first banks to sign up to the HM Treasury's Women in Finance Charter in 2016, and our commitments continue to feature on our Bank-wide scorecard. Our Women in Finance Charter and Pay Gap Reporting is published on our website annually, with this year's report stating the Bank has:

- Maintained **43%** women in senior roles for 2nd consecutive year;
- Maintained our gender pay gap, now sitting at **22.7%** (**22.8%** in 2023);
- Continued to reduce our Ethnicity Pay Gap at **14.3%** (against **18.1 %** in 2023);
- Developed a Equality, Diversity and Inclusion strategy which launched in 2024, for a better inclusive culture and society.

[Read the Jan 2024 Women in Finance Charter here](#) >

This diversity monitoring is reported annually and features within our Sustainability Report and Annual Report and Accounts, both of which are externally assured.

[Read our latest Sustainability Report](#) >

Our Diversity and Inclusion Policy, published in April 2024, explains that simply having a diverse workforce is not enough, instead we must create an inclusive environment where all people can contribute their best work. We value people for their contribution and celebrate diversity in all aspects of our business, whilst we promote equality of opportunity and aim to create a workforce that is representative of our society. We also expect our suppliers and partners to actively support us in achieving a diverse and inclusive culture and to be able to demonstrate this. We recognise that supporting the unique and diverse needs of our customer and community base is essential and work to ensure that we exceed their expectations of us.

[Read our Diversity and Inclusion Policy](#) >

Equality, Diversity and Inclusion

Committed to co-operative values and ethics



We have five colleague inclusion networks and three Inclusion forums, run by colleagues for colleagues, each sponsored by a senior Leader, who help to drive forward our inclusion and diversity strategy (detailed on the next slide).

We also run annual **mandatory** Equality, Diversity and Inclusion training to support an inclusive work environment that engages the talents, beliefs, backgrounds, capabilities and ways of working of unique individuals, creating a culture of belonging in which people are valued and respected.

Our commitment to the values and ethics of the co-operative movement continues to be demonstrated in our inclusion and diversity strategy, which includes a strong focus on:

- Increasing the number of women in senior roles at The Co-operative Bank;
- Increasing the number of women in historically male dominated areas;
- Building an even gender balance across all levels of the organisation;
- Building an ethnicity balance which is representative of the UK population across;
- All levels of our organisation;
- Overall building a more diverse workforce which reflects the diverse society we operate within.

Our commitment to addressing racial inequalities

The Co-operative Bank is committed to seeking and driving out racism, and to ensure we use our influence to challenge race inequalities. The way in which we engage with the communities we serve, and the people we employ to carry out this work aligns with our organisational and ethical values.

Do the Right Thing - We will strive towards being an anti-racist organisation by:

Reviewing what we do and the way we do it in order to identify and address any possible systemic racism. In particular, but not exclusively, through our workforce development & community engagement.

Reporting annually on our progress and activities for addressing racial inequalities and ensuring awareness that we are all responsible and accountable.

Creating and strengthening an anti-racist culture across the organisation through training, resource sharing, greater exposure to issues and reinforcing processes for reporting on, and responding to incidents of racism and discrimination.

The Halo Code – leading the way in Diversity and Inclusion

In January 2021, we became the first Bank to adopt the Halo Code, the UK's first Black hair code and we continue to support this initiative to this day.



Co-operative values remain at the heart of our culture

Our colleague networks; run by colleagues for colleagues



	Access	Elevate	Futures	Proud Together	REACH
Network Focus	Supports those with disabilities, long-term health conditions, mental health conditions and caring responsibilities.	The Gender network, supporting all colleagues with gender-based issues, with a primary aim to empower women in the workplace.	Early careers network aiming to engage, retain, and grow internal talent.	To represent LGBTQ+ colleagues and to offer support and information to anyone.	Celebrating our Race, Ethnicity and Cultural Heritage.
Aims	- Supporting and doing what is right for colleagues, particularly those who may have to face daily adversity. - Tackling stigma around key issues through education and discussion. - Bringing colleagues with shared experience together to improve wellbeing. - Promoting support available through Employee Assistance Programme (EAP). - Creating a safe, honest and confidential space for previous, current and future Working Carers. - Creating a safe, honest and confidential space for parents, step-parents, adopted parents, and wider family.	- Empower members to achieve their potential by building skills and experiences and prioritising wellbeing. - Supporting members with gender-based issues including: - Gender pay gap - Career inspiration - Parenting - Women's Health - Sexism and Discrimination - Economic and domestic abuse - Creating a safe, honest and open space in regards to all Menopause matters	- Provide a network that focusses on colleague development and allows colleagues to network with current and future leaders. - Support colleagues in building their confidence and credibility in a professional environment. - Contribute to the collective upskilling of the Bank's existing talent pool and general talent retention across the Bank.	- To provide a space for colleagues to network and share information on LGBT issues, in a safe, welcoming and confidential environment. - To provide opportunities for personal and / or professional development. - To promote and raise awareness of LGBT issues and provide visibility across the Bank, including encouraging straight ally membership to assist with advocacy. - To establish and develop links with other LGBT networks and groups.	- Develop an environment that supports a truly diverse and inclusive workplace for everyone. - Encourage people to feel comfortable in sharing their stories. - Open and normalise talking about our differences. - Enable us all to bring our whole selves to work.

Equality, Diversity and Inclusion

In 2024: a look back on some of our activity

- In March 2024, following completion of our disability confident self assessment, we were once again recognised as a Disability Confident (Level 2) Employer for a further 3 year period (2024-2027).
- Our inclusion networks hosted a wide variety of events, including: Career Inspiration sessions, Inspirational journey, book club, International Women's Day and International Men's day, Amnesty International women's day webinar, ADHD, Autism, Imposter Syndrome, and Cyber Safety for Children,
- In August 2023, the Elevate network announced that free period products had been made available across all our branches and occupancy sites for colleagues who menstruate. These products are bio-degradable and environmentally friendly, and are available to all colleagues to increase accessibility and reduce stigma.
- For the tenth year running we sponsored Manchester Pride, and for the third year running we sponsored Stoke on Trent Pride demonstrating our support for colleagues and customers who are part of the LGBTQ+ community, and supported colleagues in our branch network who took part in their local pride celebrations.
- In May 2023, we signed up to the Mental Health at Work Commitment. This enshrines six standards at the Bank, aimed at creating an open culture around mental health and opportunities for colleagues to access meaningful support. We also launched the Mental Health Advocate service, made up of 16 volunteer colleagues, to provide mental health first aid, a confidential space to talk, and signposting.
- The Bank's Menopause Policy – introduced in 2021, the policy encourages open and honest discussions about the menopause and empowers colleagues to seek support. Colleagues can also access a safe space on the intranet to share tips on coping with the menopause at work. By taking the menopause seriously, discussing it openly and having a policy in place to support those experiencing it, we can help to mitigate the potential negative impact of symptoms on the colleague and the Bank, such as reduced job satisfaction and higher sickness absence.



[Read more about our Diversity, Equity and Inclusion in our Sustainability Report, p.22](#)



Equality, Diversity and Inclusion

Management responsibility



In order to realise and satisfy both regulatory requirements and the Bank's aspirations of a fully inclusive culture and due to continued growth at The Co-operative Bank, the role of - Equality, Diversity, and Inclusion (EDI) Lead – was created in 2023 to support the Bank in developing our EDI Strategy, aligning our goals with our values and ethics, ESG Strategy and strategic cultural aims.

The Bank's Board has ultimate accountability for EDI, including setting and reviewing the EDI strategy and targets required within the proposals.

The EDI Lead has been responsible for implementing a three year EDI Strategy that has begun to drive positive changes within the Bank. They work with Senior Leaders, key stakeholders and the People Team to deliver practitioner advice and guidance whilst supporting the development of internal colleague policies, practices and EDI provisions. The first year of the EDI strategy (2024) achieved:

- Workforce EDI Data Gathering Campaign to create EDI Dashboard to support EDI Strategy action planning and regulation requirements
- Policy Review project to refresh and create policies and practices
- Aligned scorecards, frameworks, and strategies to include relevant EDI elements
- Established EDI Governance structure to oversee EDI Strategy
- EDI Risk Management awareness and practice addressed through Equality Impact Assessment (EIA's)
- Developed purpose of Colleague EDI Networks to utilise impact and influence on EDI Matters and Strategy development
- EDI Training provision review
- Engage internal and external providers for creation of annual EDI Training programme.
- Review focus on Women in Finance Charter and all Pay Gaps
- Inclusive Recruitment review
- Developed EDI Communication Plan and Intranet Hub

The EDI Strategy has engaged with many stakeholders across the business to date including HR, Risk, Reward, Recruitment, Communication, Learning and Development, Policy and Estates, Branches and Occupied sites and policy. Some of these areas already have an EDI focus although this will be enhanced through the strategy themes. Thus far, 300+ stakeholders have been engaged.



Equality, Diversity and Inclusion

Mandatory training

All colleagues have a responsibility to uphold our co-operative values and ethics, which is why Equality, Diversity and Inclusion mandatory training modules are required to be completed by all colleagues on an annual basis. This training includes numerous modules, videos and quizzes:

The first screenshot shows 'Module 1 - Equality, Diversity and Inclusion 2023' titled 'The Equality Act'. It features an image of the scales of justice and text explaining the bank's commitment to equality and the legal requirements of the Equality Act 2010. It mentions that the bank has zero tolerance against discrimination, victimisation, harassment and bullying, and that it is not acceptable. It also refers to the bank's Bullying and Harassment Policy and states that the module will explain all of this in more detail, including the nine Protected Characteristics within the Equality Act.

The second screenshot shows 'Module 2 - Equality, Diversity and Inclusion 2023' titled 'Do The Right Thing by...'. It features a large thumbs up icon and a list of bullet points: 'Ensuring you take an open-minded and fair approach with customers and colleagues at all times. Thinking carefully about why you have asked a certain person to do a certain task.', 'Thinking about the unexpected consequences of your actions and words - remember what might be amusing to you, could be offensive to others. Think about what you say and how you say it.', 'Respecting the value every colleague brings to the diversity of our Bank - we need people who act and think differently, who see things in different ways to help us find the best outcomes.', and 'Ensuring everyone has a voice in meetings - consider the structure of your meetings and how you can ensure everyone gets the opportunity to participate in a way that is comfortable for them.'

The third screenshot shows 'Module 2 - Equality, Diversity and Inclusion 2023' titled 'Step Up by...'. It features a large gear icon and a list of bullet points: 'Challenging and feeling empowered to speak up when you see or experience something that isn't right, or when something doesn't look or feel right. Find out more on how to do this in the next module.', 'Joining our Inclusion Networks and getting involved in their work.', and 'Updating your diversity data in our CoreHR system.' It also states that the demographic information provided supports the bank's commitment to inclusion and diversity by allowing them to identify, measure and monitor trends throughout their journey with us, helping them identify current and future needs, get a deeper understanding of their people and identify any existing gaps or issues and work towards improving them. It concludes with 'By updating this data it is helping each and every one of us to work in an inclusive and diverse Bank.' and a link to see the confidentiality notice.

Equality, Diversity and Inclusion

Our Diversity Calendar for 2024

As part of our commitment to promoting Diversity, Equality and Inclusion, we regularly commemorate and celebrate key calendar events throughout the year.

Regular communications and colleague initiatives marking these dates, whether it's through our Inclusion Networks and Forums, demonstrates the commitment to raising cultural awareness, engagement and celebrations for our colleagues, customers and the communities we serve.

Here are some of the observances we commemorate:-

- Holocaust Memorial Day
- LGBT History Month
- Religious Festivals & New Years
- IDAHOBIT Day
- Race Equality Week
- International Women's Day
- International Men's Day
- Autism and ADHA Awareness Weeks
- Pride Month
- National Inclusion Week
- Black History Month
- World Menopause Day
- Islamophobia Awareness Month
- Trans Awareness Week
- Trans Day of Remembrance
- World Aids Day
- Disability History Month
- Carers Week
- World Religion Day
- World Day of Social Justice
- Black Awareness Week
- Diabetes Week
- Windrush Day
- World Mental Health Day
- Mental Health Awareness Week
- World Suicide Prevention Week

Rewarding and recognising colleagues

Remuneration for colleagues

Salary and Bonus

As a Real Living Wage employer, we're proud to be one of almost 12,000 UK businesses signed up to the voluntary agreement, who believe colleagues deserve a fair day's pay. It's one of the ways we live up to our ethical workplace commitments.

Visit the Real Living Wage
website >



Our competitive total reward offering includes market based pay, excellent pension and car allowance (depending on grade). All colleagues also have the opportunity to take part in our bonus scheme, subject to the scheme rules applicable to a particular year.

Alongside this we run optional payroll giving schemes; one of which (Pennies from Your Payslip) enables colleagues to round down their pay to the nearest pound and donate the surplus pennies to our charity partner Centrepoin. Working together co-operatively we really can and do make a real difference.

Find out more about our
membership of Pennies from
Your Payslip >



Pension and Insurance

We offer:

- **A defined contribution pension scheme:** The Bank contributes up to 10%.
- **Paid pre-retirement leave:** If colleagues retire at 55 years or over, they can take up to six days paid pre-retirement leave.
- **Life assurance:** In the event of a colleague's death, named dependents will receive three times salary if they are in the pension scheme; one time salary if they are not.
- **Income protection:** Provides benefits should colleagues be incapacitated and unable to carry out their role due to ill health.
- **Personal accident insurance:** Offers peace of mind in the unlikely event of a serious accident whilst at work or on company business.
- **Health care benefit:** Our business funded health care benefit gives eligible colleagues access to specialist care for acute medical conditions.

Rewarding and recognising colleagues

Leave policies and family support initiatives

Leave Policies

Taking holidays is important to ensure a good work-life balance as well as supporting good mental and physical health and wellbeing. That's why our colleagues are entitled to:

- **27 days paid annual leave** (plus eight bank holidays, so 35 days). This rises to **30 days paid** annual leave (plus eight bank holidays, so 38 days) in the third year of service with us.
- **Buy additional holidays** during a November holiday buying window for the following holiday year.
- **Two paid volunteer days per year** for the opportunity to make a valuable contribution to local communities.
- **Extended leave** enables colleagues to take a mini unpaid career breaks of up to four weeks, or a full career break of between three months and one year unpaid.
- **Carer's leave** enables eligible colleagues to take up to 5 days (pro-rata) unpaid leave, with additional days at leader discretion
- **Emergency leave** allows colleagues to take time off to deal with an immediate emergency; with half the time off paid and the other half is unpaid.
- **Compassionate leave** provides colleagues with paid time off when they suffer the loss or there is a serious illness of a dependant or close family member.
- **Pregnancy loss leave** provides colleagues (and a partner) impacted by pregnancy loss. This will typically be up to five days at full pay, but can vary depending on personal circumstances. Colleagues will be eligible from day one of employment.
- **Domestic Abuse leave** recognises that colleagues experiencing domestic violence may need to be absent from work and will assist them with using the leave policies available and paid leave where needed to support the colleague

Family Support

We support flexible working arrangements to help maintain a healthy balance between career and home life. This includes working part time, reduced hours, job sharing, having different start and finishing hours and working from home. In addition, we offer colleagues:

- **Expecting or adopting:** Primary carers 16 weeks paid leave (maternity and adoption leave) and secondary carers four weeks paid leave (paternity/secondary carer leave).
- **Fostering:** Five days paid leave to undertake foster carer training.
- **Participating in fertility or IVF treatment:** Up to three occasions of five days paid leave in a 12 month period to support time off to undergo treatment for IVF or fertility.
- **Shared parental leave:** Up to 16 weeks paid leave shared between parents.
- **Parental mentoring and Parents & Family Forum:** To support working parents no matter what stage of the journey they are on.

Rewarding and recognising colleagues

Specialist support available

Total reward statements

We provide each colleague with a TotalReward Statement to help more fully understand the value of their total reward and benefits package at the Bank. The statements provide colleagues with the key aspects of the Bank's reward and benefits that have a tangible value attached to them. In addition our Colleague Value Proposition booklet helps colleague's to understand the less tangible aspects of the Bank's reward and benefits package.

Additional Support

As well as the support of our leaders and inclusion and diversity networks, all colleagues also have access to:

- **An employee assistance programme (EAP):** Colleagues can access our EAP 24 hours a day, 365 days a year and talk in confidence to qualified advisers who are trained to help. Colleagues can also access resources and support via the EAP app.
- **Help@Hand app:** Access to remote GP services, mental health and physiotherapy consultations and a medical second opinion service, for colleagues and their families. Colleagues can also access lifestyle, nutritional and personal training coaching from qualified professionals with this benefit.
- **My Reward discounts:** Our My Reward website and app offers discounts on a range of retailers and services, UK-wide.
- **Cycle to Work scheme:** Colleagues who cycle to work can hire a new bike and equipment up to the value of £1,000 that can be repaid through their salary.
- **Eye care vouchers:** For colleagues regularly using Display Screen Equipment (DSE), we offer a voucher for a full eye examination every 2 years and payment for glasses if they are solely required for VDU use.
- **Season ticket loans:** We recognise the cost associated with travelling to and from work. Season Ticket Loans for the purchase of season tickets (from any travel company) for travel to and from work and employee discounts with Metrolink, Stagecoach and First Travel are made available to our colleagues to help with public transport costs. These interest free loans are recouped via pay and can be repaid over 6 or 12 payperiods.
- **Public Service Duty Leave:** we recognise the efforts of colleagues in their involvement with public duties, by providing time off work to undertake these duties. This includes paid time off for Jury Duty and two weeks paid leave of absence (pro rata for part time employees) for Military Reservists to attend annual camp, or for other authorised Military use.
- **Private Healthcare** - Our business funded health care benefit gives eligible colleagues access to specialist care for acute medical conditions.
- A **Car Allowance** is provided to senior colleagues, in line with market practice, however an allowance is available for other colleagues where there is a 'job need' and the role involves significant travel



Unlock your consultations with a lifestyle coach

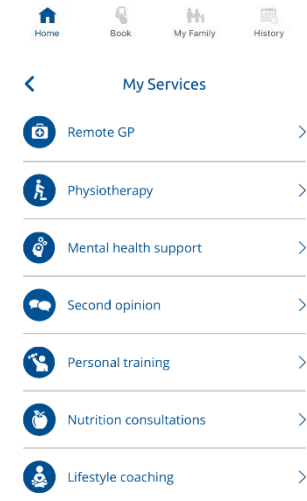
These quick questions indicate your 360 Wellbeing Score, and unlock your access to lifestyle coaching to help improve your wellbeing

Get Started

Book your Consultation

Get 121 support from our team of medical and wellbeing specialists

Book Now



Visit the Help@Hand website



Rewarding and recognising colleagues

Colleague recognition scheme

Colleague recognition schemes

Our Ethical Policy sets out our commitment to support and recognise our colleagues. We do this in a number of ways including local recognition and events as well as Bank-wide, through our STAR Awards (**S**potlighting **T**alent and **R**ecognition **A**wards).

Our STAR Awards give us the opportunity to recognise colleagues who consistently demonstrate our co- operative values and go above and beyond. Colleagues simply click on the 'Give Recognition' button on our Intranet site, select the person they wish to nominate and explain why they want to nominate them for an award and for which value - #DoTheRightThing #StepUp #TakeResponsibility #StrongerTogether. The nominee will receive an email to let them know and, providing they reference a value as part of their nomination, they will have an opportunity to win a STAR award and a £25 evoucher if they are the monthly STAR Award winner for their business area.

Nominated by colleagues, award winners are chosen from every business area, every month and every quarter, with gifts and an annual awards event to recognise the winners.

We also set aside at least one Recognition Day a year to reflect on achievements and thank our colleagues for their commitment to our customers and each other.

Many colleagues have worked with us for many years and we have a loyalty scheme to thank them for their long service, recognising 25, 30 and 40 year service anniversaries.



Performance Management and Development

Colleague guiding principles

All colleagues have regular formal performance reviews aligned with their career development.

Purpose: the Bank believes that effective performance management and development are key drivers for success. Our approach to performance is designed to ensure that all colleagues are clear about what success looks like, what we need to do to become a high performing organisation and how each individual colleague contributes towards that. Colleagues are supported to succeed with feedback, challenge and reward designed to encourage high performance.

Guiding Principles

- Performance management is a two way process with colleagues and managers jointly accountable for participating in and adhering to the policy
- All colleagues should be clear on what is expected of them and all efforts are aligned to the Bank's strategic plan
- Performance is assessed against Values and behaviours as well as the role requirements and objectives, taking into account **how** things are done as much as **what** is achieved
- Role expectations and objectives are set in line with time in role and previous experience where colleagues are new to Bank or have changed roles
- Colleagues receive regular feedback with support and challenge to help them be the best they can be
- Personal development plans are in place to enable colleagues to grow and continuously develop within their current role and to support career development
- Any problems restricting a colleague's performance are recognised and addressed
- There is a clear rating scale for differentiating between performance levels
- Indicative ratings are moderated to ensure fairness, consistency and alignment with organisational performance levels
- A link can be made between individual performance and reward

The Performance Management Cycle: there are three formal stages within the performance management cycle: Objective Setting, Mid-Year review and End of Year review. However, performance management isn't isolated to these 3 stages and continuous and regular 1:1s are held throughout the year.

Development Plans: the Bank is committed to creating an environment where colleagues can thrive and reach their potential through growth within their current role or developing capability to make future lateral or upward career moves.

Performance management conversations are a key enabler for this, providing opportunity for colleagues to discuss their career aspirations with their leader and agree supporting longer term development goals. Colleagues are expected to take ownership for their development through keeping their development plans up to date and seek opportunities to develop their skills and capabilities to meet future career aspirations. All colleagues who were in active roles (i.e. not long term absent) in December 2023 underwent full year performance appraisals. The results of these appraisals determined their end of year grade, which influenced remuneration changes reviewed under the Annual Salary Review (ASR) process.

Organisational Change

Helping colleagues to manage change

When managing change in the Bank, we do so in line with the Bank's values, policies and processes to ensure that colleagues are managed fairly and consistently. The Bank will consider appropriate steps to avoid redundancies, wherever possible. Where redundancies are an inevitable outcome, the Bank commits to consider ways to keep redundancies to a minimum, for example reduction in overtime, review of contractors and agency workers, redeployment, review of existing vacancies, consideration of changes in working hours/shift patterns. The appropriateness of these options in any particular situation will be discussed as part of the consultation process with colleagues and Unite.

Consulting for change

The "Organisational Change Agreement" is an agreement between The Co-operative Bank and Unite the Union (the Bank's recognised union). It outlines the key principles agreed between the Bank and the union to effectively manage change (including relocation, restructuring, reductions in headcount, redundancy), aiming to ensure that the Bank meets its legal obligations and that colleagues are managed fairly and consistently throughout the process.

Key to the agreement and consultation process are:

- Early information sharing with the union and colleagues
- Formal consultation periods with the union and impacted colleagues
- Appeals procedure
- Colleague support and outplacement
- Enhanced severance terms.

Notice periods from the Bank to colleagues start at 4 weeks from day one of employment increasing to 12 weeks based on years' of service.

Severance terms

In the event of redundancy taking effect, enhanced severance payments are made to colleagues. Where a colleague has at least 12 months' service will be entitled to a payment of 5 weeks pay. Severance payments increase with service up to a maximum payment of 52 weeks. The enhanced severance includes any entitlement to a statutory redundancy payment.

Redeployment and outplacement support

When a colleague is served with notice, the Bank will provide them with outplacement support via a third party provider. They provide CV advice, interview guidance and tools and techniques for job searching to help individuals identify and secure their next career move and support them on their transition outside of the Bank.

We will also support colleagues to seek redeployment in the Bank through our Careers Website. Colleagues at risk of redundancy are supported through the recruitment process. Colleagues will be provided with reasonable time off (paid) to attend any outplacement support session and for internal/external employment interviews.

Wellbeing support

An employee assistance programme is available 24 hours a day to provide advice on a range of topics including resilience, change and money. Colleagues can also access resources and support via app and website which offers a Financial Wellbeing toolkit with guidance and podcasts covering topics such as budgeting, debt and stress. Help@Hand app: Access to a remote GP service, mental health support consultations, physiotherapy consultations for colleagues and their families

Organisational Change

Help and support for colleagues

Support available for all colleagues

There are a number of support resources available to all colleagues through periods of change which are actively signposted:

- ✓ Their leader
- ✓ Their Trades Union representative (see Trade Union support slide)
- ✓ Information available on the 'Organisation Change Hub' on our intranet site
- ✓ Telephone support via our Employee Assistant Programme (offering confidential support from an expert team 24 hours a day, 365 days a year at any time, day or night)
- ✓ Access to unlimited mental health support on their mobile device via the **Help@Hand App**

Organisational change hub

Intranet page: The Organisation Change hub is available to **all** colleagues and can be found on our intranet site. The site offers support on:

- Organisational change frequently asked questions
- Redundancy terms
- Pension Q&A's and contact details
- Outplacement support

We also have the following additional resources available:

- All available Bank job vacancies can be found through our HR system, **CoreHR**.
- **MyDevelopment:** Online learning tools available to **all** colleagues
- **Outplacement support:** Any colleagues on notice of redundancy will have access to services to support them through this change

Pensions advice

- There is a comprehensive set of Pension Q&As on our intranet for colleagues who are leaving the Bank.

Our Values and Ethics in action

Supporting our charity partners through our product propositions

Donating over £1.5 million to our Everyday Rewards charity partners

From 2016-2024, our Everyday Rewards proposition gave eligible current account customers the option to donate their monthly rewards to one of five charities. Thanks to the generosity of these customers, **£151,659** was donated to these charities in 2022. This proposition ended on 31 May 2024, however, we will continue to work closely with our long-standing partners to support them in other ways.

Centrepont mortgage donations

We make a donation to Centrepont for every new mortgage we provide. These donations are used to fund the charity's national Helpline and their Homelessness Prevention and Relief Service in Manchester.

There were a record number of calls to the Helpline in 2023, with more young people than ever struggling to find affordable accommodation. More than 6,271 young people were supported by the Helpline in 2023 with 3,897 calls, 1,648 emails and 726 web chats answered. Our donations have allowed the Helpline to increase the team to 14, so that more calls can be answered. In Manchester, the Homelessness Prevention and Relief Service received 1,331 referrals in 2023. The team works closely with other services to provide a package of individual support that helps young rough sleepers, who often have complex needs, to move on from homelessness.

Hospice UK and Co-ops Legal Services partnership

In 2023, we partnered with Co-op Legal Services (not linked to The Co-operative Bank) to provide our customers with access to specialist legal support. As a result we donated £25,000 to Hospice UK - a proportion of the commission that the Bank earned through the partnership. Access to legal services is something that many of our customers require and giving the option to take these services in partnership with Co-op Legal Services, whilst helping to make a donation to Hospice UK, is an important way that we can support our charity partner.



Our Values and Ethics in action

Supporting our charity partners

The Co-operative Bank, our colleagues and customers are committed to driving social change in line with our values and ethics. We do this by:

- Supporting UK co-operatives by funding the Business Support for Co-ops Programme, a business development programme for co-operatives, and by providing free banking services for UK co-operatives;
- Supporting the third sector by providing free banking to charities, social enterprises and credit unions;
- Working to end youth homelessness through our partnership with CentrepoinT;
- Supporting survivors of economic abuse and driving positive change for victims within the financial services industry in partnership with Refuge;
- Defending human rights in partnership with Amnesty International UK;
- Supporting our colleagues' volunteering and fundraising activities through our employer supported volunteering programme and match-funding programme. All colleagues are afforded two working days per year to volunteer in their communities;
- Ensuring access to basic bank accounts for under-served members of the community, including prisoner bank accounts and facilitating access to banking for homeless people;
- Supporting our partner – Zero Hour – in promoting the Climate and Ecology Bill;
- Galvanising support from our colleagues and customers for Disasters Emergency Committee Emergency Appeals.

We campaign for social and economic change in line with our values and ethics.

The Co-operative Bank believes that operating with values and ethics must go beyond simply ensuring we are ethical in how we behave as a business. We also have a duty to use our voice to stand up for causes in line with our values and ethics.

We commit to campaigns based on the following principles:

- The causes we support must be in line with our values and ethics.
- The causes we support must be strengthened by the expertise we can bring as a bank.
- The causes we support must be underserved and represent genuine needs that others have neglected and where our support can therefore make a major impact.
- The impact we can make will be more powerful if we focus our resources rather than backing multiplicity.



**Friends of
the Earth**

Our co-operative values and ethics in action

Bringing back nature with Friends of the Earth

Our Postcode Gardener programme

In 2023, The Co-operative Bank and Friends of the Earth joined forces to bring back nature by helping to restore greenery and wildlife in over one thousand nature-deprived spaces across the country. The UK is now one of the most nature-depleted nations in the world and this decline in nature has a very real impact on people's mental and physical health. Our multi-year partnership will address nature deprivation in communities through the Postcode Gardener programme.

Postcode Gardeners are professional gardeners, who can guide, organise and support local people to connect with each other and work together to help greenery and wildlife flourish in their local area. The idea was born out of the realisation that whilst many people want to live on streets thriving with greenery and wildlife, they need help to make it happen. Supported by Friends of the Earth and The Co-operative Bank, Postcode Gardeners will work street-by-street to green their neighbourhood and bring communities together to transform where they live.

Postcode Gardeners will work with local residents to encourage nature back into neglected public spaces by planting wildflowers and edible plants; creating wildlife corridors between properties and by building planters to line walkways. They plan and co-ordinate activities, teach people which plants to grow where and run events to share knowledge and skills. It's a powerful combination of gardening and community organising that helps to build social connection and to nourish mental and physical wellbeing, whilst replenishing nature. In the process, they'll co-create resilient, thriving and healthy neighbourhoods to benefit nature and local communities across the country. Our Postcode Gardeners will transform over one thousand green spaces for the benefit of nature and local communities across the country.

Our first Postcode Gardener site launches

In 2023, we identified new areas that would benefit from some street gardening, by mapping out places that lack green space and are most at risk of air pollution, flooding and urban heating. Following this analysis, we opened Postcode Gardener sites in Hackney (London), Bideford (Devon), Notting Dale (London), and Balsall Health (Birmingham).



Branching out into Wales

In 2024/5, the Postcode Gardener programme has been rolled out to six new communities in Ravenhill in Swansea, Ely and Caerau in Cardiff, Rhyl in Denbighshire and Ferndale in the Rhondda Valley, bringing the total number of projects to 17. See the next page for more stats as at the beginning of 2025.

Our co-operative values and ethics in action

Bringing back nature with Friends of the Earth

Our impact in numbers

Halfway through the Postcode Gardener programme, our projects have achieved all this and more...

17

Postcode Gardeners operating across England and Wales.

479

public spaces transformed by Postcode Gardeners and their communities.

19,000+

pollinator-friendly plants planted – including native wildflowers, fruit bushes, vegetables, herbs and spring bulbs.

3,100+

community members took part in gardening and nature based activities.

205

local groups, such as schools, residents' groups, faith groups, cultural centres and women's groups, collaborated on Postcode Gardener projects.

£30,000

of income generated by Postcode Gardener pilot projects through further grants, maintenance contracts and corporate services.



The
co-operative
bank

Our co-operative values and ethics in action

Ending youth homelessness with Centrepoint

Our work with Centrepoint

Since 2017, our longstanding partnership with Centrepoint has made us a leading voice against youth homelessness, and since then we have raised over £2.5 million for the charity.

We make a donation to Centrepoint for every new mortgage we provide and our colleagues undertake fundraising for Centrepoint throughout the year. These donations are used to fund the charity's national Helpline and their Homelessness Prevention and Relief Service in Manchester.

In 2023, we also launched the Bridge to Banking scheme which enables young people with no fixed address to apply for a bank account. This can subsequently help them to access benefits, employment and financial independence.

The Co-operative Bank also carried out work experience and employment workshops for Centrepoint's beneficiaries, with two young people going on to join the Bank as apprentices.

Stay Active September

Since 2017, our longstanding partnership with Centrepoint has made us a leading voice against youth homelessness. In September 2023 colleagues took to the streets to raise funds for Centrepoint as part of our annual Stay Active fundraiser. Teams completed 5 and 10 mile walks, raising over £2,000.

Our ongoing work

In 2025, the Bank has become the sole corporate funder of the Rough Sleepers Initiative in Manchester – a project that aims to provide specialist outreach support to over 200 young people sleeping rough on the streets of our hometown.



As part of Coventry Building Society Group, we will be investing £1 million into an Independent Living Programme, enabling the development of 30-plus homes in Southeast Manchester for young people aged 18-25 with experience of homelessness who are in work or completing an apprenticeship.

"Every four minutes, a young person faces homelessness in the United Kingdom. They are isolated, vulnerable and need help to get back on their feet and get their lives back on track."

We are delighted to have The Co-operative Bank's staunch support for our vision of a society in which youth homelessness is a problem of the past."



Seyi Obakin OBE,
Chief Executive, Centrepoint

Our co-operative values and ethics in action

Standing up for human rights with AIUK



Our partnership focus

The Co-operative Bank has been partnered with Amnesty International UK for over 30 years. In line with our Ethical Policy, we're committed to promoting and protecting the human rights of people all over the world.

In 2025, our focus shifts to the UK. This year, The Co-operative Bank and Amnesty International are working together to expose the poverty and human rights crisis that is happening within our communities, through ground-breaking research and a campaign to ensure that social security is treated as a human right.

Previous work...

In 2023, Co-operative Bank colleagues and customers once again supported this impactful campaign. Over 3,500 actions (including letters, signed postcards and petition signatures) were collected and sent to governments and judiciaries worldwide to ask them to free human rights defenders from prosecution for standing up for their communities.

Team Amnesty

Amnesty International UK is one of our longest-standing corporate charity partners. In 2023 we were proud to become the official partner of the charity's fundraisers, Team Amnesty.

Team Amnesty consists of passionate supporters who raise funds to support Amnesty International's vital work to expose human rights abuses, educate and mobilise millions of people around the world and protect those facing human rights injustices. Whether supporters walk, run, cycle, bake, or jump out of planes – all money raised supports Amnesty International's work.



Our co-operative values and ethics in action

Supporting survivors of economic and domestic abuse

We have partnered and campaigned with national domestic abuse charity, **Refuge** since 2015. Our work with Refuge led to **the launch of an industry-wide Financial Abuse Code of Practice in 2018**, which aims to provide survivors of economic abuse with better and more consistent support from across the banking and financial sector. To date, 19 banks and building societies have signed up to the initiative.

Towards the end of 2021, in partnership with Refuge, we commissioned research which concluded that **one in seven people in the UK had experienced economic abuse** in their current or former relationship. Responding to this evidence, Refuge and The Co-operative Bank joined together with representatives from the banking sector, domestic abuse organisations, parliamentarians and the Domestic Abuse Commissioner, to publish a recommendation report which was designed to improve the experience of survivors of economic abuse. The recommendations were as follows:

1. Introduce a safe online tool for survivors to contact their bank to request support from their vulnerable customer support team in relation to economic abuse
2. To ensure that this tool is accompanied by appropriate signposting to advice and support for tech abuse from specialist domestic abuse organisations, given the high coincidence of tech and economic abuse.

Additionally, in 2023 we updated our website following Refuge's recommendation to add definitions of financial and economic abuse to the site, along with advice on how to access support. This information page was designed not be shown in customers' browser history, protecting those experiencing abuse from the possible consequences of seeking support.



Our ongoing work with Refuge challenges the financial industry to update the support and protection they offer to survivors of economic and domestic abuse.

In 2025, we sponsored a campaign with Refuge to raise awareness of the 'red flags' of economic and domestic abuse. We sponsored an art installation in London, introduced window displays in all of our branches, and even brought some of the physical red flags to our flagship branch windows to create awareness amongst customers and passers by.

Our resources for people
experiencing financial and
economic abuse



Refuge

For women and children.
Against domestic violence.

Our values and ethics in action



Campaigning for the Climate and Nature Bill with Zero Hour

The Climate and Nature Bill

In 2024, we continued our work as an ambassador of Zero Hour, the campaign for the Climate and Nature Bill (formerly the Climate and Ecology Bill). Protecting our planet is a fundamental part of our unique customer-led Ethical Policy, and a cause that needs support now more than ever.

Back in 2006, our customers joined us in 'The Big Ask', a campaign led by Friends of the Earth for the Climate Change Bill, which then evolved into the Climate Change Act 2008. But as the environmental landscape continues to change, it's now time for new legislation. The Climate and Nature Bill has been drafted by scientists, legal experts, ecological economists and environmentalists, and would require the UK Government to take responsibility for its contribution to greenhouse gas emissions, in an active attempt to restore biodiverse habitats, and stop further damage to our natural world through the production, financing, transportation, and disposal of goods we consume, globally.

In 2024, we sponsored a cross-party event in the Houses of Parliament, and we encouraged our customers to join us in campaigning for this important bill and called upon them to contact their MP.

Over the years...Environmental changemakers and event sponsorship

On 5 June 2023, World Environment Day, the Bank's CEO joined Zero Hour to hand in the United for Nature petition, calling on the Prime Minister to halt and reverse nature loss by 2030. This is an important target from the Climate and Nature Bill that, if enacted, would see our natural world on the road to recovery. The petition was signed by over 15,000 members of the public and is supported by key organisations, such as UK Youth for Nature and the Wildlife Trusts.

Previously, the Bank sponsored Zero Hour's strategic roundtable on the future of the Climate and Nature Bill in London. The session brought together campaigners, influencers and environmentalists to discuss how the Bill can gain further support and be prioritised by the Government.



Our values and ethics in action

A history of our ethical campaigning

1992: First Customer Led Ethical Policy
Oppressive Regimes



<https://youtu.be/6HCeJJAQjnY>
<https://youtu.be/YBZ34iQM3-Y>

2002: Cluster Munitions
Campaign



2019: Guardian advert against
fossil fuel funding



Pictured in situ in the Guardian Newspaper

1995: Fairtrade vending machines
in head office buildings



<https://youtu.be/PyTNN3bN23g>

2003: Opposing anti-gay
hate speech



2019: Manchester Pride
Sponsor



Manchester Pride Facebook
Album

1996: Landmine Advert



<https://youtu.be/J3xdq5miyfE>

2007: "Burma – We're
still watching" campaign



2019: Climate Strike



Climate Strike Facebook Post

1997: Wanker Advert
about disability rights



<https://youtu.be/6IJZ2PyxTKA>

2008: Campaign to stop
Tar Sands



2019: Amnesty International
Write for Rights campaign



Write for Rights Facebook Post

1998: Ethical Policy



2016: My money, my Life



<https://youtu.be/1opXSBiGDN8>

2022: Withdraw from This
Campaign



<https://www.youtube.com/watch>

Our Values and Ethics in action

Ethical products and services

Our commitment to UK co-operatives

We support the UK's co-operative sector by offering free business banking to co-operative businesses through our Charity & Community Account. This account remains one of the most generous community free banking products available to UK community organisations.

Find out more about our
Charity & Community
Account here >

Business Support programme for co-operatives

We've also provided £2.9m of funding to Co-ops UK for the provision of a range of support packages and information to help new and existing co-operatives. This unique support package has previously been referred to as The Hive, and was rebranded in 2023 to broaden the reach and range of support services on offer. This unique business support programme created by Co-operatives UK in partnership with The Co-operative Bank, gives co-operative businesses from all sectors of the economy access to the expert advice and guidance they need to thrive. Since the start of the programme to the end of 2022, 1,786 groups had benefited from technical advice, peer mentoring, training and introductory workshops.

Find out more about the
Business Support programme
for co-operatives >



Customer Donation Fund

All of the Bank's Charity & Community Account holders can apply for up to £1,000 twice per year from the Customer Donation Fund to support special projects and fundraising activities. Over £1.2 million has been donated through the Fund to over 1,300 local causes since it was launched in 2003. The projects that we have supported span across the whole of the UK and make a positive difference to their local communities. From supporting positive mental health, to collecting surplus food and delivering it to the most vulnerable, to supporting disabled children to build their confidence, to equipping young people with the skills they need for a better digital future, the Fund ensures that our community banking proposition makes a difference to local communities.

Find out more about how we use
the Customer Donation Fund in
our Sustainability Report >

Charity and Co-operative Lending Fund

The Co-operative Bank has provided over £35m of loan funding to help charities, co-operatives and social enterprises grow and invest in their organisations in 2024. The fund offers a range of options to help organisations achieve their objectives now and into the future.

Find out more about our charity
and co-operative lending fund
here >

Our Values and Ethics in action

Ethical products and services

Find out more about how
our products are governed >

We take an ethical approach to banking and are the only high street bank in the UK with a customer-led Ethical Policy. We offer a range of products and services. Our products and services are governed by our Product Governance Framework which is managed at the Group Product Governance Committee.

Personal Banking

- **Cashminder accounts** - We offer a basic bank account to support people who may not qualify for a standard Bank account ensuring everyone has access to banking.
- **Student accounts** - Our student account offers an interest free overdraft limit.
- **Prisoner accounts** - We offer a basic bank account to prisoners close to their release date. This supports in helping ex prisoners get access to employment, housing and improving their overall self esteem.
- **Mortgage Applications** - For every new mortgage or product switch application completed, we donate £5 to youth homelessness charity CentrepoinT.
- **Children's Savings** - We offer a Future Fund account for children under 18. Children between the ages of 7-18 can solely operate this account.
- **Energy Saving Home Improvement Tool** – We've worked with Energy Saving Trust (EST) to bring customers a tool for creating a personalised Energy Saving Improvement Plan which can help save on energy costs by making their property more energy efficient.

Business Banking

We provide practical support by offering banking services (and helpful funding) to support co-operatives, community businesses and charities.

- **Charity & Community Account** - An account that offers registered charities, community interest companies and credit unions an ethical way to bank.
- **Customer Donation Fund** - The Customer Donation Fund is open to customers on our Charity & Community Bank Account, where each customer can apply for a grant of up to £1000 for projects. The Donation Fund has run twice per year since 2003 and colleagues across the bank cast their votes and the top scorers can win. For the last 2 years the Bank has donated £100k per year. Since the implementation of the fund, over £1.2m has been donated to 1380 organisations.
- **The Business Support for Co-ops Programme** - We've committed £2.9 million of funding to support growth in the co-operative sector since our partnership began in 2016. This investment has helped hundreds of co-operatives and groups with expert business advice, workshops, training and mentoring.

Our Values and Ethics in action

Products, Achievement & Awards

We take an ethical approach to Banking and are the only high street bank in the UK with a customer-led Ethical Policy.

Our credit and debitcards

In line with our Ethical Policy statement against the release of chemicals that persist in the environment, we continue to issue PVC-free credit and debit cards and have been doing so since 2007. In its place we use the plastic glycol-modified polyethylene terephthalate (PETG), which does not contain or use chlorine in its production. Furthermore, all the inks we use in our customer mailings are chlorine-free, and either water or vegetable-based.

Awards

- **Which? Eco Provider** (2025) – for the second year running, we have been recognised as one of only three Eco Providers, a testament to the longstanding commitment we’ve had since 1998 to withhold finance to any business whose activity contributes to fossil fuel extraction or production.
- **Rated ‘Excellent’ with Trustpilot**
- **Business Moneyfacts Awards** Best Charity Bank Provider (2025 for the tenth year running)
- **Hospice UK Gold Compassionate Customer Care Award** - In 2024, we became the first Bank to receive a Gold award from Hospice UK’s new Compassionate Customer Care programme.
- **Moneyfacts** Branch Network of the Year (2022 for the fifth year running)
- **Business Moneyfacts Awards** Best Charity Banking Provider (2022 for the seventh year running)
- **Prolific North Awards** – In 2022, we received the Creative for Good award for our ‘Withdraw from This’ campaign, aiming to lift the lid on the damage other banks are doing to the planet.
- **Fossil Free Banking Alliance:** We were the first UK high street bank to become members of the Fossil Free Banking Alliance, a group of ethical and environmentally friendly organisations founded by Bank.Green.
- We are a **MotherTree recommended bank** thanks to low registered carbon emissions associated with our products.

[Click here to read more about the Bank’s achievements and awards](#)



Best Charity Banking Provider



Our Values and Ethics in action

Ethical screening & Environmental impact of product portfolio

We do not provide banking services to businesses and organisations that conflict with our Ethical Policy.

We implement a robust screening process to ensure that every new application for business banking services is screened against our customer-led Ethical Policy. In 2024, 262 businesses were referred for enhanced screening and as a result, seven applicants were not accepted as Co-operative Bank customers

In particular, the Bank does not offer services to companies associated with:

- Extraction of minerals and deep sea bed mining
- Intensive farming methods
- Unsustainable harvest of natural resources, including timber, fish and palm oil
- Exploration, extraction or production of fossil fuels

As a result, our portfolio does not include products/services with direct and substantial negative impact on the achievement of global environmental objectives.

Customers who bank with us want to understand how their money will be used. Our customers' money will not be put to use in a way that conflicts with our values and ethics. They also want to know that we strive to provide banking services to businesses and organisations that share our values and ethics. Support will be given to such organisations provided they meet criteria regarding risk and return.

In 2022, we released an updated version of our Ethical Policy, informed by current views of our customers. We strengthened our commitments under new pillars of People, Planet and Community and updated our screening guidelines, building on our historic list of reasons why we would not provide banking services to businesses or organisations.

Our new commitments mean that we now screen businesses against:

- Participation in deep sea mining
- Degrading irrecoverable carbon stores in peatlands and forestlands
- Exploration for fossil fuels
- Activities that use exotic or specialty leather as just a few examples.

Managing customer risk:

Our Risk Policy requires the closure of accounts for risk related issues, such as when customers are involved in or receive profits from organised crime or illegal activities such as the sex trade, drugs or human trafficking, as well as where there are regulatory requirements. In 2024 we closed 545 customer accounts (674 in 2023) due to risk related issues, including suspicion of money laundering and failure to provide documentation to satisfy Customer Due Diligence requirements.



Our Values and Ethics in action

Social impact of product portfolio

The Co-operative Bank has several product propositions that contribute to social impact both locally and nationally.



Centrepoint Mortgage Donations

For every eligible mortgage we provide to our customers we give £5 to Centrepoint. Since 2017, we've raised over £2.5 million for the charity, who support young people facing homelessness. Previously these mortgage donations have funded Centrepoint's helpline which provides specialist advice and guidance for young people across the UK who are homeless or worried about housing. This year, the donations are helping young people who are sleeping rough in our hometown of Manchester through specialist outreach work.

Read more about
the Customer
Donation Fund

Customer Donation Fund

For every £100 increase across collective balances held in Community Directplus accounts the Bank adds 20p to the Customer Donation Fund, with a minimum of £5,000 being awarded twice a year. These donations go towards supporting community organisation and community projects. During the pandemic we awarded all applications for the fund to ensure we could help communities at a grass roots level. Since 2003, we've donated over £1.2 million to over 1,380 community projects across the UK.

Read more about
our partnerships

Charitable Fund

The Co-operative Bank Charitable Fund commits a portion of underlying Bank profits to continue driving positive social and environmental change, whilst responding to the needs of our communities. In 2025, this has included supporting Refuge with their National Domestic Abuse Helpline, Hospice UK with their work to secure the future of hospice care, and Amnesty International UK with their work to protect human rights in the UK.

Our Values and Ethics in action

Responsible Sales Practices

- Staff training – All staff, including non-customer-facing colleagues, receive training covering the Bank's Code of Conduct as well as the FCA's Consumer Duty. In particular, Consumer Duty training ensures that all Bank colleagues understand the core principles of the standards and embed the overall aim to improve outcomes for customers which is how we evidence our Responsible Sales Practices under a Banking lens.
- Monitoring – As part of its function as the third line of defence at the Bank, the internal audit team carries out regular investigations and submits reports covering all operations including business banking and their sales practices. Screening of client risk profiles and potential lending opportunities are carried out by the corporate credit underwriting team and aim to ensure that all corporate lending carried out by Relationship Managers falls within the Risk appetite of the Bank.

Our Values and Ethics in action

Application Procedures of environmental and social guidelines

- Risk and impact assessment: As mentioned in pages 67 and 92, the Bank conducts environmental and social impact assessments both against our Ethical Policy for all Business and Corporate customers upon application of a product. Also, for Corporate customers, risk assessments are carried out at product origination, i.e. when a business customer applies for lending or a bank account, as well at annual review stages meaning risk assessments are carried out at all key stages of the project cycle; the customer's environmental and social risk management capacity and relevant stakeholders are considered among other ESG factors. All assessments are carried out internally and serve as input to the overall decision to on-board a customer.
- Action plans: Page 23, regarding our partnership with Zellar, highlights the Bank's efforts to support our corporate clients with detailed action plans to address environmental deficiencies (including clear performance indicators and targets, a defined time period, and a baseline calculation).
- Approval process and responsibilities: Page 67 describes the Bank's loan approval process in relation to its Ethical Policy which applies to ALL business lending.
- Disengagement in case of non-compliance with environmental and social guidelines: In cases where a business does not comply with the Bank's Ethical Policy, a customer will receive communication that their application has failed as it doesn't align to the Bank's risk appetite. No businesses are denied lending as a result of qualitative Environmental and Social impact assessments if they comply with the Ethical Policy unless they are in breach of regulation such as the MEES requirements.
- Training: Page 95 highlights our internal approach to Environmental and Social impact assessment training which is provided to Relationship Manager and Corporate Underwriters at the Bank; these colleagues also receive training on induction regarding the Bank's Ethical Policy and how to apply it as detailed in page 67.
- Coverage: The above applies to 100 % of relevant operations, i.e. risk assessments for corporate lending are not carried out for businesses opening basic bank accounts.

Consumer Duty

Embedding Consumer Financial Protection across the Bank

On 31st July 2023, the Financial Conduct Authority (FCA) introduced Consumer Duty designed to increase the current level of consumer protection in the retail financial services market. Consumer Duty requires firms to act to deliver good outcomes for retail customers and is entirely aligned to our ethical principles.

The Bank has continued to embed Consumer Duty carrying out its second annual self assessment evidencing the outcomes we are achieving for our customers.

Key successes from our 2025 self assessment

- **Culture shift** – Continued embedding of Consumer Duty through development of training and guidance
- **Open Book Changes** – 57 harms fixed.
- **Closed Book Review** – 10 harms fixed.
- **Communications training (Consumer Understanding) & Champions** – Identified and delivered further training to communication champions from each operational area.
- **Vulnerable customers** – Utilisation of improved MI now being used to better understand our customers and take appropriate action based on their individual needs.
- **Improving key Consumer / Customer KPIs** – Customer Support metric within the Consumer Duty Measurement Framework turned green for the first time since inception. This was due to significant improvements made in key metrics including Customer and Mortgage ASA, Complaints and Fraud metrics.
- **Customer Outcome Monitoring** – Implemented within first line to identify, evidence and improve customer outcomes across the Bank and to better align QC with QA (Outcome Testing).
- **Price and Fair Value improvements** – Developed a new empirical costs and income analysis tool to enable the comparison of returns across product with similar characteristics.

We acknowledge that the Bank is still on the journey of developing, improving and evidencing the appropriate data-led outcomes focused required under the Duty to fully understand the outcomes our customers are receiving.

As an ethical bank, we already strive to ensure that we act in good faith, avoid causing foreseeable harm and support customers in pursuing their financial objectives. Consumer Duty is a further opportunity to strengthen and sharpen our conduct frameworks to evidence that the Group is delivering good outcomes.

Our Customer Channels

What we offer to customers

There are a number of channels that our customers can use to get in touch with us.

- **Branch network:** our high-street branch network operates nationwide, with colleagues on hand to offer expert advice, services and support. Customers are able to find their nearest branch using our branch locator, and can also withdraw money through their local Post Office.
- **Mobile banking:** our highly-rated free mobile banking app is available on the App Store and Google Play, enabling customers to access banking services on the go. Customers are able to check their balance and transaction (including pending debit card transactions) transfer money and set up new payments, apply for savings accounts and credit cards, get fraud alerts and manage personal details. Customers are also able to log in and send a secure message 24/7, which we will respond to in 48 hours.
- **Online banking:** customers can bank securely online without having to visit a branch or call us, and without the need for a smartphone.
- **Telephony:** phone lines are open 8am to 6pm Monday to Friday, 9am to 5pm Saturday and Sunday. Customers can listen to their latest transactions, available balance, pay bills, transfer money and order statements through telephone banking.
- **Online:** we have a strong online presence through a variety of social networking sites, including X (Twitter), Facebook, LinkedIn and Instagram. Customers can reach out through these platforms through a private direct message and request support with issues that they are facing.
- **British Sign Language (BSL) interpreters:** customers that use British Sign Language can call us using a video interpreter through InterpretersLive! This service is available on demand from Monday to Friday 8am to 6pm and Saturday 9am to 12pm.
- **Distribution & Outreach – targeting underserved demographics** – The Bank’s website has received WCAG 2.2AA accessibility status, whilst all digital channels work to the same high standard of accessibility, ensuring all customers are considered.

Find out more about our
accessibility services



Our Customer Objectives

Treating customers fairly



The Co-operative Bank

Reviews 8,897 • Great



✓ VERIFIED COMPANY

Our customer objectives

At The Co-operative Bank, supporting our customers **when** they need us, in the **way** they need us to, is at the heart of all we do.

Driven by our unique customer-led Ethical Policy, our focus is on:

- Ensuring good customer outcomes and treating our customers fairly
- Communicating with them in a way they can understand
- Being transparent in our interactions and working hard to evolve our products and services.

Colleagues are empowered to support our customers' needs and we respond to all customer feedback, using this to enhance our processes and procedures in order to improve the customer experience for everyone who chooses to bank with us.

Ways to contact us

Our customers are encouraged to contact us whenever they need to. This could be to:

- **Report a scam** (we're supporting the 159 initiative which aims to quickly connect UK consumers with their bank when they suspect fraud)
- **Share accessibility needs** (we've joined up with Experian so that our customers can easily share their needs with us and other organisations, all in one go)
- **Seek support with online or mobile banking**

All the ways to contact us are listed on this [page](#)

Read more about 159 and
our Experian Support Hub >

Reporting on our customer service

Feedback from our customers is really important to us as part of our commitment to being an ethical bank.

- **Trustpilot:** customers are encouraged to leave us honest, unbiased feedback through Trustpilot to help us improve our service. We are proud to have earned a 'Excellent' 4.5 out of 5 rating, and use this platform to reach out to customers if they report an issue or require further assistance.
- **Complaints Data** - Whilst we are proud of our record of high customer advocacy and recognition by external commentators, we also recognise that sometimes things can go wrong. When it does we encourage our customers to tell us and we try to put things right as quickly as possible. The feedback we receive from our customers is invaluable and it helps us to shape the way we do things in the future. Every six months we submit information to the Financial Conduct Authority (FCA) about the complaints we have received from our customers. The information includes details of the number of complaints we receive, how many we have closed and how many we have upheld (found in favour of the customer). **This data is shared with the Bank's Board of Directors and Executive Management team on a quarterly basis.**
- **Independent service quality results** - as part of a regulatory requirement, an independent survey was conducted to ask approximately **1,000** customers of each of the **16 largest personal current account providers** if they would recommend their provider to friends and family. The results represent the view of customers who took part in the survey.

Visit our Trustpilot page
here >

View our Complaints Data >

View our Service Quality
Survey Results >

Financial Inclusion

Supporting our most vulnerable customers

Specialist FinancialSupport

If a customer is experiencing financial difficulties, we ask them to get in touch as soon as possible by calling us to ensure the customer receives the specialised support and advice they require from the right team. We provide a free phone number for our financially vulnerable customers. Alternatively customers can send a secure message once logged into online banking 24/7. For some customers who find themselves in an emergency situation we have a Hardship Fund available which can gift up to 3 x 100, providing immediate support.

Accessibility services

We have a range of tools available to support customers, including providing a range of documents in large print, Braille and audio, BSL interpreters at branch appointments as well as through video calls and hearing induction loops. For visually impaired customers we ensure correspondence, statements, PIN advice and brochures are available in large print, Braille and audio. Our website also adheres to WCAG AA standards where possible, and before any page goes live we use automated testing, expert reviews and direct feedback from our users.

Partnership with CitizensAdvice

The Co-operative Bank and Citizens Advice Manchester have developed a referral programme for customers who are experiencing difficulties. The programme provides access to a dedicated adviser who completes a holistic assessment to understand the customer's issues. The adviser provides immediate advice and support, and can refer customers with more complex issues to their local Citizens Advice. We have added a self-referral link on our website and posters with QR codes in branch so customers can go to them directly without needing to speak to us first.



Money management and Financial Education

We want to help our customers when they need us the most, from major life events to everyday financial hints and tips. That's why we've created an online money management hub, offering help and advice on managing finances with links to helpful tools and internal and external support.

Responsible treatment of clients with debt repayment problems

Customers are selected for a Pre-Arrears strategy due to them showing a high likelihood of entering financial difficulties in the next 12 months. This is based on a risk assessment which includes a wide range of internal account behaviours and external information from Experian. Customers who are selected for Pre-Arrears contact are sent a letter advising them to contact the Bank if they feel they require assistance. However, customers may also contact the Bank themselves because they are concerned regarding their finances. Outbound dialling and SMS messages are also sent to a selection of customers.

Financial Inclusion

Supporting survivors of abuse

We have created online support information for people experiencing Economic Abuse, the information contains advice such as how to stay safe online and signposts to support. The information will not show in their search history for safety.

We have also created a digital disclosure form so customers can let us know if they are experiencing abuse and tell us what they need.

Our colleagues have received training from Surviving Economic Abuse, with guidance on how to identify and support customers. We have also volunteered to participate in their pilot of an Economic Abuse Evidence Form, to make it easier for people to disclose to multiple firms.

On the footer of every website page, our customers can access a pop up, which signposts customers to support with economic abuse, without leaving a digital footprint, keeping survivors safe when they are seeking support.

In 2025, window displays were installed in all branches as part of a campaign with charity partner, Refuge. These displays signpost customers who are experiencing 'red flags' of economic abuse to talk to us in branch to get support.

Safe Spaces

All our branches are now a 'safe space', this is an initiative created by UK SAYS NO MORE, a national campaign facilitated by Hestia that works with partner agencies to provide a safe space for people who need it. The space will enable them to seek support if they need it with access to a phone and contact numbers.

Find out more about
Safe Spaces here



SURVIVING ECONOMIC ABUSE

Find our economic abuse pop up
at the footer of our website



Approximately 1 in 6 adults in the UK experience economic abuse*, a common form of domestic abuse.

Would you spot the red flags?

Restricting access to bank accounts,
controlling someone's income or building up
debt in their name is abuse.

*Based on the Know Economic Abuse Report 2020

**Our branches are Safe Spaces
and our staff are trained to support you.**

Whether you're our customer or not, if you need help
speak to a member of the team in branch.



The **co-operative** bank
Ethical then, now and always



Financial Inclusion

Supporting our customers

- **Bridge to Banking:** We are continuing to work with youth homelessness charity, Centrepoin, to help those with no fixed address in our hometown of Manchester to access financial services. Unlike with many other financial services provider schemes, the Bridge to Banking initiative does not rely on charity case workers and applicants travelling to branch as the application can be sent to our processing team directly. This process is more convenient for Centrepoin staff as it requires less time and resource, meaning more applications can be made and more support offered to young people experiencing homelessness. This is offered to young people accessing employability workshops facilitated by our learning and development specialists.
- **Prisoner banking:** As part of our Unlocked Scheme we allow prisoners who are within 6 months – 6 weeks of their release to apply for a basic Cashminder account, so long as they have no existing bank accounts already set up. As these customers get ready for their release and their reintegration into society, we support them with this integration by helping them to have a bank account ready for them to use when they are released from their incarceration.
- **NIVO app for bereavement:** This enables customers to contact the Bank about the bereavement process. Customers can use NIVO to communicate via smartphone messaging, send documents securely and send queries to the team. This provides customers with clear communication at a time that suits them, during a very difficult period, and reduces call wait times.
- **Experian Support Hub:** Across the UK millions of people have accessibility or support needs, like reading letters in large font, getting statements in Braille, being given more time to complete tasks, or using a British Sign Language interpreter. Experian Support Hub delivers a single online portal for consumers to share support needs with multiple organisations in one simple process. As a member of the Support Hub, we are providing our customers with a further channel where they can conveniently communicate their support needs to us, so they can access assistance, save time and avoid repeating themselves unnecessarily.



Financial Education

Supporting our customers

Financial and debt-related problems

There are a number of external agencies and charities that can offer help to customers around financial and debt-related worries. Numerous links are shared on our website for our customers to access.

[Signposting to independent help for financial support](#)



Digital inclusion and supporting customers with their finances

- The bank is committed to supporting all customers with their financial objectives and have introduced the following:
- A network of colleagues across the bank 'Digital Bees' who actively support in the community with financial education
- A dedicated financial support section on the public sites, which also includes signposting of dedicated third parties
- Tools & Guides hubs for each product, providing specific educational content
- Articles and advice, providing top tips in navigating the economic climate
- Educational content around fraud, educating our customers and helping them to keep their money safe.

Visit our tools and guides page

Financial Education

Informing our customers

Financial education and guidance

We've put together a set of helpful guides and calculators to help our customers manage their money better. Through our tools and guides page on our website, our customers can access information about:

- The types of banks accounts that they can apply for
- How to open a bank account
- Credit history and bank accounts
- What a joint bank account is
- How affordable overdraft facilities are
- How a credit card works
- How to save money
- Types of mortgages and what is involved in buying a home
- Banking services for young people
- How to manage money

Visit our tools and guides
page >

All of this and more can be accessed on our website.

Managing fraud

Protecting our customers from fraud is a priority for the Bank. We take extra measures to educate our customers about fraud, common fraud threats, scams, and how they can protect themselves online.

Read more on our security
and fraud page >

Promoting Human Rights

Our actions as a Bank

We support the UN Guiding Principles on Business and Human Rights. As detailed in our Ethical Policy, we will not provide banking services to any business, organisation or government that:

- Fails to implement basic labour rights as set out in the Fundamental UN ILO Conventions (e.g. avoidance of child labour, or that actively oppose the rights of workers to freedom of association, e.g. in a trade union)
- Impedes access to basic human necessities (e.g. safe drinking water or vital medicines)
- Engages in irresponsible marketing practices (e.g. with regard to tobacco products and manufacture)

[Read our full approach in our updated Ethical Policy here](#) >

Modern Slavery and Human Trafficking

We are committed to ensuring that our business, and our suppliers, are free from modern slavery and human trafficking, upholding the principles of our Ethical Policy. Our Modern Slavery and Human Trafficking Statement sets out the steps we're taking to prevent modern slavery. The maximum working hours for school leavers in the UK is 40hrs per week our contract states 35hrs per week for all employees. We also have detail in our modern slavery document regarding suppliers to not engage in or support the use of child labour, and to provide specific consideration to young persons between the ages of 15 and 18, particularly in respect of their hours of work and safety.

[Read our Modern Slavery and Human Trafficking statement here](#) >

Governance

How we embed ESG in our business

ESG Governance

Our Articles of Association

We have written the co-operative values and Ethical Policy into The Co-operative Bank's Articles of Association, **ensuring they are a permanent and important element of our governance**. This also includes a requirement for the Bank to designate responsibility for Values & Ethics to a Board committee with an independent chair. The Bank's Values & Ethics and Nominations Committee enables the Bank to meet this requirement, and as Chair of the Bank, I felt it was important for me to chair the Committee given how central values and ethics are to the Bank. I took on this position in January 2025, replacing Sue Harris the previous chair.

Without values and ethics, we could become just like any other bank and our customers have told us that's not what they want – values and ethics are some of the main reasons why many of our customers choose to bank with us. Our return to mutual ownership on 1 January 2025, by becoming part of the Coventry Building Society Group, will further serve to enhance the activity the Bank carries out in relation to its values and ethics.

In order to effectively discharge its responsibilities in relation to Values and Ethics the **Values & Ethics and Nomination Committee** oversees the adoption of co-operative values and ethics within the organisation and is required to report at least annually to the board on the Bank's compliance with its statement to Cooperatives UK. It monitors compliance with the Bank's values, ethics, and Environmental, Social and Governance (ESG) strategies; in alignment with the Group's ESG strategies; including the Bank's journey to 'Net Zero'.

Jo Kenrick, Chair of the Bank Board



Read the Values & Ethics and
Nomination Committee Terms of
Reference



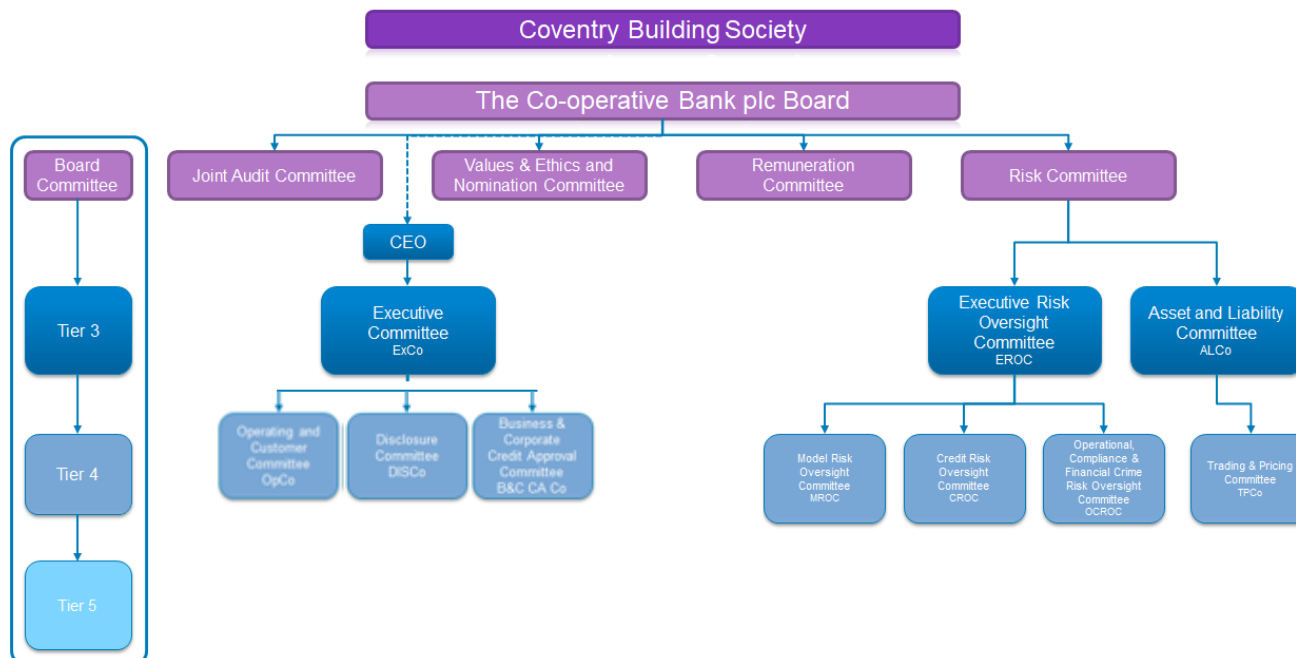
Governing our business

Our governance structure

The Co-operative Bank plc Board and Committees of the Board Structure including Executive Level Committees

For more information regarding the Bank's governance framework, please see the Corporate Governance Report in the 2024 Annual Report and Accounts (p.53 onwards).

The Co-operative Bank plc Board and Committees of the Board Structure along with the Executive Committees



Read our Corporate Governance Report, p53



For more information regarding the Bank's Corporate Governance, please see our 2024 Annual Report and Accounts.

Risk Governance

Board & Committee	Risk focus
Board	The Board has collective responsibility for the long-term success of the business. Its role is to provide leadership within a framework of prudent and effective controls which enable risk to be assessed and managed. It sets the values and standards and ensures the obligations to its shareholder, customers and other stakeholders are understood and met. The Board sets the strategy and approves plans presented by management for the achievement of the strategic objectives it has set. It determines the nature and extent of the significant risks it is willing to take in achieving its strategic objectives and is responsible for ensuring maintenance of sound risk management and internal control systems.
Risk Committee (RC)	RC is responsible for reviewing and reporting its conclusions to the Board on the Bank's risk appetite and propose for approval by the Board and oversee the implementation of a Risk Management Framework, taking a forward-looking perspective and anticipating changes in business conditions.
Executive Risk Oversight Committee (EROC)	EROC is responsible for oversight of the risk profile of the Bank (within the agreed Board risk appetite). The Committee reviews and challenges the risks associated with the Bank's business strategy, plans and overall management of risks. EROC achieves some of its objectives through delegating responsibility to sub-committees including OCROC, MROC, and CROC. EROC will escalate, where appropriate, to the Board via the RC.
Executive Committee (ExCo)	ExCo is responsible for defining and implementing the Board-approved strategy successfully by monitoring and managing delivery against plan and applying appropriate risk management actions to emerging risks.
Asset and Liability Committee (ALCo)	ALCo is primarily responsible for overseeing the management of capital, market, earnings, liquidity and funding risks. Its responsibilities include identifying, managing and controlling the balance sheet risks in executing its chosen business strategy, ensuring the capital and liquidity position is managed in line with appropriate policies and that adequate capital is maintained at all times. In order to align the function of key committees more closely, ALCo started to report directly to the RC. This change will further reinforce the mitigation of financial risks through embedding a structure whereby key asset and liability management decisions are set within a risk governance setting.
Model Risk Oversight Committee(MROC)	MROC ensures, on an ongoing basis, that the model rating systems and material models are operating effectively. This includes providing Executive level review and challenge of the model risk and the impact of model risks on the Bank's business model and strategies. MROC also provides oversight of the Bank's IRB permissions, including the exemptions where the Bank applies the Standardised Approach to calculate Pillar 1 capital requirements.
Credit Risk Oversight Committee(CROC)	CROC is responsible for monitoring significant credit risks and issues within the entire credit lifecycle, the controls and management actions being taken to mitigate them and to hold to account the executives responsible for actions. CROC reviews the credit risk strategy on an ongoing basis, making recommendations to EROC as appropriate.
Operational, Compliance & Financial Crime Risk Oversight Committee (OCROC)	OCROC is responsible for monitoring significant operational risks and issues including significant conduct, regulatory, product, reputational, fraud and AML risks and issues, the controls and management actions being taken to mitigate them and to hold to account the executives responsible for actions. OCROC oversees the current and emerging operational risk profile, ensuring key risk exposures are managed within risk appetite and reported to EROC as appropriate, including the monitoring of adherence to the RMF alongside a process for continuous improvement.

Read about our Risk Management, p.99



For more information regarding the Bank's Risk management, please see our 2024 Annual Report and Accounts.

Governing our business

Our Board Committees

The Bank Board has established Board Committees, namely: the Risk Committee, the Values & Ethics and Nomination Committee, the Remuneration Committee and the Joint Audit Committee.

All Board committees have terms of reference, describing the authority delegated to them by the boards of the Companies. Each of these committees has a role in ensuring the effective oversight by the board and the Bank's subsidiaries.

More information regarding each of these Board committees, along with an introductory statement from each of the committees' chairs, can be found within the Corporate Governance Report contained within the 2024 Annual Report and Accounts (p.53 onwards).

Read our Corporate Governance
Report, p.53 onwards



Governing our business

Executive Governance

Committee	Purpose
ExCo	Meetings are held at least monthly, chaired by the CEO with their direct reports as members (the Company Secretary is a standing invitee). The CEO appoints all members. Only members and regular attendees attend meetings, unless invited by the Chair. The core responsibilities of the Committee include, but are not limited to, the oversight and implementation of: • Strategy, Direction and Performance of the Bank including development and maintenance of the Bank's business model; • Culture, Values and Ethics including overseeing the adoption and embedding of the Bank's culture, values and ethics statements and overseeing the implementation and periodic refresh of the Bank's Values and Ethics Policies; • Matters Reserved for the Board including identifying matters required or appropriate for escalation to the Board or appropriate Board Committee and to review and agree all submissions to the Board or Board Committees; • Customer experience / service including ensuring service delivery meets agreed performance levels and any exceptions are highlighted, understood and where necessary, have action plans to remediate; • Product and pricing including approval of any new products and / or significant changes to existing products or supporting processes; • Risk and Governance including monitoring the Bank's performance against risk appetite and where required approving the implementation of risk management actions where breaches have been identified or are considered likely; • Capital, Assets, Liabilities and Profitability including managing the capital and liquidity position of the Bank. Monitoring the Bank's capital, assets, liabilities and profitability performance versus forecasts and approving the implementation of mitigating or remedial actions where required. Oversight of significant financial performance issues affecting the successful delivery of the Bank's strategic objectives or plans; • Transformation and Change Delivery including monitoring significant change initiatives including major capital expenditure projects and their associated risks, breaches and proposed management actions for resolution; • Organisation and Operations including ensuring that appropriate levels of authority are delegated to senior management and overseeing breaches of operational processes; • People and Resourcing including identifying and developing strategies to effectively deal with people and resource related issues that might adversely affect the Bank's ability to achieve its strategic objectives; and • External Reporting including oversight of key materials presented to external stakeholders (including regulators) and investors. Members: Andrea Melville (Chair), Richard Hiom, Maria Cearn, Chris Smart, John Ward, Lucy Becque, Rachel Macfarlane, Mark Towse, Chris Davidson Standing invitees: Catherine Green

Governing our business

Executive sub-committees

All Executive Committees have Executive and senior management representation.

Sub-committees of ExCo	Purpose
Operating & Customer Committee	Agrees and monitors operational strategies and plans; operating and financial performance; policies controls and risks; performance for customer service and operational people and resourcing matters.
Disclosure Committee	Acts to support the CEO to consider whether materials might be published against the tests of inside information, confidentiality or privilege.
Business & Corporate Credit Approval Committee	Considers and approves or otherwise individual credit proposals for Business & Corporate customers.

It should be noted that the Bank's People Committee and Transformation Committee were disbanded and their responsibilities were reallocated to other committees in the governance structure.

Governing our business

Board composition and responsibilities

Board composition

Following the return to mutual ownership on 1 January 2025, there have been changes to the Bank's Board. More information regarding the composition of the Board, biographies and length of service of the directors, and diversity can be found in the Corporate Governance Report contained within the 2024 Annual Report and Accounts (p.53 onwards).

Role and responsibilities of the Board

The Board has collective responsibility for the long-term success of the Bank. Its role is to provide leadership within a framework of prudent and effective controls which enable risk to be assessed and managed. It sets the values and standards and ensures that it's obligations to its shareholder, customers, employees and other stakeholders are understood and met and that the Bank's strategy is delivered by management, in alignment with the overall Group strategy.

Read our Corporate Governance
Report, p.53 onwards



Governing our business

Board Effectiveness

Read our Corporate Governance Report, pg.53 onwards



Performance evaluation

The Board agendas continue to balance the need to provide oversight and governance across the business and to provide challenge where appropriate.

In July 2022, following a process led by the Nomination Committee (now the Values & Ethics and Nomination Committee) and Board, the Bank engaged the Chartered Governance Institute UK & Ireland (“CGI”) to carry out an external review of the effectiveness of the Bank Board and Committees of the Bank Board. The review comprised a series of one-to-one interviews with all Directors and members of senior management, and observation by the CGI of Board and Committee meetings in November 2022. The outputs of the review were presented to the Bank Board in February 2023. The Bank Board then carries out a self-effectiveness review in 2024.

Senior Managers and Certification Regime (SMCR)

The Bank continues to deliver robust compliance with its governance over the Senior Managers and Certification Regime and Directors received training in connection to the requirements set out in the SMCR.

Conflicts of interest

Pursuant to the Companies Act 2006, the Directors have a duty to avoid situations in which they have or may have interests that conflict with those of the Bank unless that interest is first authorised by the other Directors. The Bank’s Articles of Association allow the Board to authorise such potential conflicts and there is a procedure to deal with actual or potential conflicts. All potential conflicts approved by the Board are recorded in the Conflicts of Interest Register.

The Board has determined that a Director with a potential or actual conflict will not be permitted to form part of the quorum or vote upon the matter giving rise to the conflict. The Board has put in place protocols to address potential conflicts arising from the appointment of the Non-Executive Directors who are not independent for the purposes of the Companies Act 2006. Prior to taking up any external appointment or responsibilities, Directors are asked to consult with the Company Secretary and the Chair of the Board.

Governing our business

Board Independence

- Information regarding the independence of the Board can be found within the Corporate Governance report contained within the 2024 Annual Report and Accounts (pg.53 onwards) and on the Governance pages of the Bank website.
- The Board is one-tiered with executive representation from two executive directors. The two executive directors are not independent.
- As at 1 August 2025, the Board consists of nine Directors, seven of whom are non-executive directors (NEDs) and two who are executive directors (CEO and CFO).
- Coventry Building Society is the ultimate parent company of the Bank.
- The NED Chair of the Board was considered independent on their appointment. Six of the NEDs are independent (INEDs) and one is a representative of the ultimate parent company of the Bank and therefore a non-independent NED.

Read our Corporate Governance
Report, pg.53 onwards



Governing our business

Board Independence

- Although the Bank does not have a premium equity listing and does not voluntarily comply with the Financial Reporting Council's (FRC) 2024 UK Corporate Governance Code (the "Code"), it is comfortable that its corporate governance framework reflects many of the principles and provisions set out in the Code, which includes provisions relating to Board composition.
- The Directors have to declare any interests in related parties. Six of the NEDs are also NEDs of the Bank's ultimate parent company, Coventry Building Society and one NED is the Group CEO of Coventry Building. Society.

Read our Corporate Governance
Report, pg.53 onwards



Governing our business

Board diversity

The Board re-adopted the Board Diversity Policy, as recommended by the Nomination Committee (reconstituted as the Values & Ethics and Nomination Committee in February 2025), in July 2024, following approval of a three year Equality, Diversity and Inclusion ('EDI') strategy in February 2024. A new role, EDI Lead, was created to support the Bank in developing the EDI strategy, bearing in mind proposals for a new regulatory framework on EDI in 2024. The Bank will continue to develop its EDI strategy in line with the wider Group it now belongs to.

During 2024, in addition to approving the Diversity Policy, the Board continued to oversee progress with the Bank's diversity targets, with an aspirational target of 40 % diverse membership of the Board.

In addition, the Values & Ethics and Nomination Committee continues, when required, to identify and nominate, for approval by the Board, candidates to fill Board vacancies having regard to the balance of skills, knowledge, independence, experience and diversity on the Board. The Nomination Committee also annually reviews the Board Diversity Policy, and the measure of objectives set in implementing the policy and progress on achieving the objectives.

Further information relating to the activities undertaken by the Bank in relation to inclusion and diversity can be found within the 2024 Directors' Report.

Read our Director's Report,
pg.81 onwards



Governing our business

Embedding our Values, Ethics and ESG Commitments

Under the Bank's Articles of Association, there is a requirement for the company to promote and conduct the company's business to the extent practicable, in a manner informed by the established values of the cooperative movement.

In particular, the Bank is required to promote and conduct its business in such a manner with regard to:

- How it relates to, communicates with, balances the interests of, and otherwise deals with its stakeholders; and
- How it applies the profits of the Bank, in accordance with the dividend policy set out in its Articles of Association.

More information regarding how the Bank's Values and Ethics are enshrined in the Bank's Corporate Governance framework can be found in the Bank's Articles of Association, which are published on the Bank's website. Further information regarding what this means in practice can be found in the Values & Ethics Committee Report contained in the 2024 Annual Report and Accounts and the 2024 Sustainability Report.

Read our Articles
of Association here



Read our Corporate
Governance Report, pg.53
onwards



Embedding our co-operative values and ethics and ESG principles

Our Values, Ethics and ESG principles are embedded throughout our governance structure, where it is mandatory for us to align the terms of reference to our commitments.

The Bank's ESG Strategy is formally governed through the Board, Values & Ethics and Nomination Committee, our Operating and Customer Committee and the Executive Committee (ExCo). In addition, Climate Risk is managed as a thematic risk through the Executive Risk Oversight Committee (EROC).

All Environmental, Social and Governance (ESG) matters are escalated from ExCo to the Values & Ethics and Nomination Committee as necessary, or from EROC to the Risk Committee.

Governing our business

Statutory disclosures

Transfer of shares

The shareholder of the Bank may transfer any shares in any manner which is permitted by the Statutes and is from time to time approved by the Board of the Bank respectively.

Approval is required from the Prudential Regulation Authority if a person intends to acquire or increase its 'control' of a UK authorised person (which includes the Bank).

Voting rights

Subject to the Bank's Articles of Association, and to any special rights or restrictions as to voting for the time being attached to any shares, the provisions of the Companies Act 2006 shall apply in relation to voting rights of the Bank's shares.

For more information regarding the Bank's statutory disclosures and shareholder voting rights and underlying processes, please see the Corporate Governance Report in the Annual Report and Accounts (pg.53) and the Bank's Articles of Association, which are published on the Bank's website.

Read our Articles
of Association here



Read our Corporate
Governance Report, pg.53
onwards



Governing our business

Board and Executive Remuneration

Details of the governance arrangements and approach to the Bank's remuneration, including remuneration disclosures, can be found within the Director's Report on Remuneration, contained in the 2024 Annual Report and Accounts. Within this report, individual compensation for both the CEO and CFO is disclosed. Aggregate compensation for the Executive Management team can be found within the Pillar 3 disclosures within our Annual Report and Accounts.

Details of how Executive and colleague remuneration is linked to Environmental, Social and Governance (ESG) performance can be found in the Director's Report on remuneration to the shareholder.

Read page 86 onwards of our
Corporate Governance Report



Climate Risk

Our approach towards Climate Change Risk

Climate Change poses a significant threat across society and it is important that the Bank takes action to assess and minimise the financial risks it poses through the Bank's operations and its customers. These risks will arise through both Physical means and in the Transition to a Net Zero economy.

As such, the Bank has established a robust approach towards managing the financial risks posed by Climate change:

Ethical Banking and protecting and enhancing the environment

We don't provide banking services to organisations that conflict with our customers' views on a comprehensive range of issues, including: human rights, the environment, international development and animal welfare.

We will not provide banking services to any business or organisation whose activity contributes to global climate change or the destruction of ecosystems, via:

- The exploration, extraction or production of fossil fuels (oil, coal and gas, including from tar sands and hydraulic fracturing)
- The operation and development of fossil fuel fired power stations or fossil fuel infrastructure, such as oil and gas pipelines
- The exploration or extraction of minerals using deep seabed mining, including the conduct of research that facilitates deep sea mining
- The degradation of areas that are critical stores of irrecoverable carbon
- The manufacture of chemicals that are persistent in the environment, bio-accumulative in nature or linked to long-term health concerns
- The unsustainable harvest of natural resources, including timber, fish and palm oil
- The development of genetically modified organisms where there is evidence of uncontrolled release into the environment, negative impacts on developing countries, or patenting, e.g. of indigenous knowledge
- The development of nanotechnology in circumstances that risk damaging the environment or compromising human health.

We make sure the businesses we provide banking services to do not conflict with our Ethical Policy and the views of our customers by applying a stringent screening process throughout the lifecycle of our business accounts.

[Read our approach towards Climate Change Risk in the Risk Management section within the ARA](#)

Climate Risk

Our approach towards Climate Change Risk

Risk Management

The Prudential Regulation Authority's Supervisory Statement 3/19 - Enhancing banks' and insurers' approaches to managing the financial risks from climate change, required regulated entities to embed the consideration of the financial risks from climate change in governance arrangements, incorporate the financial risks from climate change into existing financial risk management practice, use long term scenario analysis to inform strategy setting and risk assessment and identification, and develop an approach to disclosure on the financial risks from climate change. The Bank remains compliant with these requirements.

The Bank recognises that ensuring climate change risks are embedded across the Group's governance framework is critical to supporting climate-conscious decision-making. Climate change risk is currently incorporated into the Risk Management Framework and is managed as a thematic risk, recognising the linkage and impact of climate-related risks upon other principal risks. Decisions to mitigate, transfer, accept or control any significant climate-related risks identified are made in accordance with RMF principles. All reports presented to the Board and its committees must disclose the risks, including financial risks arising from climate change where relevant, that have been considered in relation to the recommendation.

The risks and opportunities arising from climate change are a key focus of the Bank. The Bank assesses all material exposures relating to financial risks arising from climate change as part of the Internal Capital Adequacy Assessment Process and reviews the need to conduct a full scenario analysis modelling on an annual basis. We are continually identifying and assessing climate-related risks and opportunities to ensure we are positioned as the ethical banking alternative for our customers and stakeholders.

[Read our approach towards Climate Change Risk in the Risk Management section within the ARA](#)

Climate Risk

Our approach towards Climate Change Risk

Assessing capital requirements in relation to Impacts of climate change

The Co-operative Bank has an embedded process to assess its capital requirements, the Internal Capital Adequacy Process (ICAAP). The purpose of the ICAAP is to inform the Board of the continuing assessment of the Bank's risks, how the Bank intends to mitigate those risks and how much current and future capital is required having considered other mitigating factors. The Bank is then required to assess whether it meets the overall financial adequacy rule by meeting the assessed capital requirements across the planning period. This process is a requirement set by the Bank's regulator, the Prudential Regulatory Authority (PRA), and is a requirement for all UK financial services firms.

The ICAAP is a process to ensure the management body (both supervisory and management functions):

- Adequately identifies, measures, aggregates and monitors the institution's risks;
- Ensures the institution holds adequate internal capital in relation to the institution's risk profile; and
- Uses sound risk management systems and develops them further.

Climate risk forms a key component of the Bank's risk assessment. As such, the Bank assesses a variety of approaches to determine climate related risks and the appropriate action required to mitigate these risks. This includes:

- Stressing the Bank's secured portfolio with a detailed scenario analysis. This involves taking the latest Bank of England Climate Based Economic Stress (CBES) scenario and applying it to the Bank's portfolio of mortgages. Key components this analyses are:
 - Transitional risks – Risk to customers credit quality and property values whereby the UK Government were to enforce minimum house efficiency standards to prevent material climate change and reach its EU commitments
 - Physical risks – risk to customers credit quality and property values in the event of a climate disaster, looking at properties that currently have an element of flood and subsidence risk
 - The Bank considers the impact of both of these types of risks and considers how this may be impacted by early government action, late government action and no government action.
- The Bank performs a more qualitative approach relating its Corporate portfolio, understanding industries at risk and the potential impact to the Bank's capital position
- Finally, the Bank performs a peer analysis to ensure the Bank is not an outlier in regards to action being taken to reduce climate related risks across its product offerings and operations
- These approaches help inform the Bank on the areas of climate related risks and any potential gaps/actions. A key step of the ICAAP is to assign Executive owners for each proposed action and drive accountability in mitigating these potential climate related risks.

Climate Risk

Our approach towards Climate Change Risk

Climate Modelling Approach

Although the Group's IFRS9 models do not explicitly consider the potential impacts of climate risk, the Group recognises a climate-related judgement adjustment in respect of relevant physical and transition risks. Through the use of a bespoke climate risk model, we are able to assess exposure to climate risks against key credit risk parameters. We monitor exposure to physical risks on the retail secured book on an ongoing basis and, in our Expected Credit Loss Calculation, we have recognised a climate-related judgemental adjustment in respect of the transition risk associated with the low-energy efficient housing stock, where low EPC rated properties are assumed to be exposed to value risk.

ESG Risk Monitoring

As part of our simplification process, we now capture EPC for applications where physical valuations are completed. Monthly EPC monitoring is completed on mortgages to track portfolio EPC against industry averages. Further, all Relationship Managers receive regular training on ESG Risk including Climate Risk assessments to support their ability to carry out effective ESG Risk impact assessments – the training is also provide to our corporate credit underwriters as well. Below are a few examples of topics that are covered:

- Environmental Risk
 - Climate Risk – Physical and Transitional
 - Third Party Supplier Risk
 - Regulatory Risk
 - Concentration Risk – Sector-based
- Social Risk
 - Supply Chain Risk
 - Health & Safety
- Governance Risk
 - Succession
 - Cybersecurity
 - Compliance

[Read our approach towards Climate Change Risk in the Risk Management section within the ARA](#)



Climate Risk

Our approach towards Climate Change Risk

Governance

The corporate governance framework is continuously reviewed to ensure it includes sufficient focus on ESG topics, including climate risks and opportunities.

- Board: Reviews, challenges, and approves the Group's strategic plan, including its ESG strategy and strategic approach to managing climate change risk.
- Risk Committee (RC): Reviews and approves the results of climate-related scenario analysis and stress testing. Challenges the Group's ongoing management of climate change risk.
- Executive Risk Oversight Committee (EROCC): Provides oversight of the Group's prioritisation, treatment and management of any significant climate-related risks identified. Reviews the embedding of climate change risk within the RMF, policy development, developing materiality determinations and scenario analysis/stress testing.
- Risk Oversight: Delivers the day-to-day management of climate change risk through the RMF. Scenario analysis and developing materiality determinations are owned within the Risk function, including the Group's modelling of climate change risk.

As part of our 2025 ESG Commitments, The Co-operative Bank has committed to providing additional ESG training for all colleagues including the Executive and Board as well as introducing a mandatory ESG objective to further embed ESG Risk considerations across the bank.

[Read our approach towards Climate Change Risk in the Risk Management section within the ARA](#)

Climate Risk

Our approach towards Climate Change Risk

ESG Risk approach to Corporate Finance – ESG Integration

As well as our business screening approach outlined on slide 67, all business lending that is subject to a full credit application goes through a qualitative ESG Risk analysis:

- All new and increased lending applications that are part of our Relationship Managed corporate portfolio are assessed against a number of ESG Risk-related considerations as part of the Credit Application Template;
- Applications are reviewed against a business' ESG strategy, exposure to Climate and Transition Risk as well as considering any social risks that the business may present that conflict with our Values and Ethics, such as whether they pay employees a Living Wage;
- After completion of the Credit Application by the Relationship Manager, our Corporate Credit Underwriters will review the application, including the ESG Risk section, to ensure that the lending proposal is not overly exposing the Bank to ESG Risk;
- On top of this risk assessment; all secured corporate lending is subject to a minimum EPC Key Credit Criteria.

Achievements and actions-to-date:

- In 2007 we became the first bank to go 'beyond carbon neutral'. We have since carried out annual carbon offsetting to address operational emissions
- In 2015 we were the first UK high street bank to sign the Paris Pledge denying finance for coal mining and power generation;
- Commitment in our Ethical Banking policy to not provide banking services to any business or organisation whose core activity contributes to global climate change;
- The Bank signed up to the United Nations Environment Programme Finance Initiative (UNEP FI) Principles for Responsible Banking in February 2020. In May 2025, we published our [fourth report](#);
- In 2022, we became the first UK high street bank to be part of the Bank.Green Fossil Free Banking Alliance, which helps climate-conscious consumers to choose a bank that isn't financing the climate crisis;
- Established our Green, Social and Sustainability (GSS) Financing Framework to facilitate the funding of assets with environmental or social benefits and issued our inaugural Green Bond in 2022;
- In our 2023 Sustainability Report and ARA, we reported our Scope 3 emissions in full for the first time alongside Scope 1 and 2 data. We also increased our number of reported carbon intensity metrics for completeness; this supports comparative analysis and ensures different aspects of the Bank's carbon emissions profile are represented in final reporting. This continued in 2024 where we conducted all emissions calculations internally for the first time.

Read our Green, Social and
Sustainability Financing Framework

UNEPFI membership

Tax Strategy and Compliance

Our Corporate Responsibility

The tax strategy of The Co-operative Bank is set by the Bank's Board of Directors on the recommendation of the Audit Committee. The tax strategy is reviewed on an annual basis.

The Bank is a signatory to HMRC's Code of Practice on Taxation for Banks. The Code of Practice sets out certain obligations for adopting banks and governs the Bank's approach to governance, tax compliance, tax planning and its relationship with HMRC. The Code of Practice requires banks to have adequate governance to control the types of transactions they enter into; not undertake tax planning that aims to achieve a tax result that is contrary to the intentions of Parliament; comply fully with all their tax obligations; and maintain a transparent relationship with HM Revenue & Customs. Furthermore:

- The Bank aims to minimise and has a low appetite for tax risk in line with the Code of Practice on Taxation for Banks
- The Bank is committed to a responsible approach to the payment of tax and to complying with both the spirit and the letter of tax law
- The Bank's Taxation Control Standard sets out the control objectives and minimum control requirements to ensure the principles set out in the Financial Reporting Risk Policy can be translated into real, owned controls
- A key objective of the tax strategy is that the Bank pays the correct amount of tax at the right time, according to all relevant laws and regulations applicable to the Bank
- Tax evasion and avoidance – Tax planning transactions having no commercial purpose other than the avoidance of tax, or which are not aligned to the Bank's strategy will not be undertaken
- Transactions will not be structured in away that will have tax results for the Bank inconsistent with the underlying economic consequences unless there exists specific legislation designed to give that result
- Remuneration packages for employees, including senior executives, will be structured so that the Bank believes that the proper amounts of tax and national insurance contributions are paid at the right time on the rewards of employment
- The Bank is committed to engaging with HM Revenue & Customs (HMRC) in a professional, open and transparent manner.
- The tax strategy is approved by the Board annually and was last approved in November 2023.
- Our Ethical Policy states **"We will not provide banking services to any business or organisation: That takes an irresponsible approach to the payment of tax in the UK and elsewhere"**.
- A note on Tax Jurisdiction - The Co-operative Bank is based solely in the UK.
- As a UK based retail bank with limited products there is limited risk of supporting customers in tax evasion or tax avoidance.
- The Bank provides customer data to HMRC under its BBSI, ISA and AEOI reporting obligations.
- The Bank is obligated by law to have reasonable procedures in place to prevent facilitation of tax evasion – failure to do so would result in the business carrying out a Corporate Criminal Offence (CCO). This risk is managed by our Financial Crime team (more on this can be found in the next section under **Financial Crime**).

Read more on page 210 of our
Annual Report and Accounts



Read more in our Ethical
Policy



Read more in our published
Tax Strategy



Cyber Security

Management and ISO 27001:2022

Criminals continue to demonstrate increasing levels of sophistication and ambition to attack organisations and their colleagues. The threat environment continues to evolve, with recent examples of financial services organisations or supporting industries being targeted. The Co-operative Bank, along with all other financial institutions, is required to ensure regular user awareness work is conducted to help combat certain cyber-attacks and to embed a cyber aware culture across the organisation. This is done through:

- **Regular colleague communications** – The Cyber Security team publish regular communications on the Bank Intranet which focus on key topics to improve cyber awareness and are also used to issue topical reminders around internet security. Written communications are also supplemented with ad-hoc lunch and learns sessions hosted by one of the Cyber Security team.
- **Cyber Security Awareness Week** – An annual Cyber Security Awareness Week is hosted at the Bank to bring attention to cyber risks and provide colleagues with opportunities to ask any questions they may have in open fora. The week consists of daily intranet articles, regular blogs from senior leaders, talks from industry experts as well as competitions to encourage engagement.
- **Bank-wide user education** – All Bank employees are mandated to complete an Information Security training module every year. The training module covers common cyber threats and what colleagues should do to stay safe from them.
- **Targeted user education** – In addition to the Bank-wide mandatory training, privileged users who may be at a higher risk of social engineering attacks have been identified so that they can receive targeted training to help them combat any of these attacks.

Cyber Security

Management and ISO 27001:2022

The Bank has a Cyber Security Strategy and aligns to industry best practice and frameworks with regular independent assessment.

As part of this, the Bank received ISO 27001 certification for the facilitation of internal cyber security services for corporate infrastructure, inclusive of server architecture, end point management, firewalls, and systems internally managed for the delivery of core services to The Co-operative Bank; awarded by the British Assessment Bureau.

This certification was first issued on 21 February 2023, recertified on 20th February 2024 and again on 20th February 2025. This year, we have also aligned to the latest version of the standard, ISO 27001:2022. This update reflects the evolving cyber security landscape and ensures our security practices remain robust, effective, and fit for the future.

ISO 27001 is one of the most widely recognised and internationally accepted information security standards, designed to help a business set up, administer, and maintain an information security management system (ISMS).

A copy of our certificate can be found on this slide →



Provided by the British Assessment Bureau following our successful ISO27001 certification.



Cyber Security

Empowering our customers

As well as supporting the education of Bank colleagues, the team looks to empower our colleagues, customers and local communities to be more assured when using technology by providing them with educational resources and encouraging them to move forward in the digital world confidently. As a Bank that does the right thing, it is important that we offer support to our customers where it is needed.

- **Cyber Awareness Modules** – The Bank's Cyber Security team have developed a number of resources to help our business customers supplement any training they already offer to staff. These have been created in partnership with BPP, a training service provider, and modules can be accessed from the Bank's public site. The e-learning modules are freely available to any Bank customers but it is believed significant benefit could be gained by business customers. The modules are publicly available which means that the resources could also be used by charities to help improve local communities' understanding of cyber security at no cost to them.

Find our cyber security awareness modules here



- **Cyber Resilience Centre** – The Bank is a core member of the Greater Manchester Cyber Resilience Centre helping our business customers stay safe. The Resilience Centre looks to grow and strengthen the region's resilience to online crime by providing the highest standards in leadership, integration and collaboration across the cyber eco-system in Greater Manchester.
- **Community Support Sessions** – The Bank is a partner of Greater Manchester's Chamber of Commerce (GMCC), an organisation designed to provide business support to companies of all shapes and sizes, with over 4500 members. The Bank's Cyber Security team have hosted sessions in conjunction with GMCC allowing us to provide cyber education to individuals and organisations across Manchester.
- **Responsible Disclosures** – In continuing to build a safe and secure online community, we have developed our responsible disclosure programme to best work across our customers, suppliers, industry, academia and the cyber security community. The Bank maintains a responsible disclosure process that provides an appropriate channel to report security concerns which are then triaged by the Bank.

Find out more about responsible disclosures



United Nations Environment Programme Finance Initiative

Principles for Responsible Banking

On 3 March 2020, we became an official signatory of the UN Principles for Responsible Banking (PRB) – a single framework for a sustainable banking industry, developed through an innovative partnership between banks worldwide and United Nations Environment's Finance Initiative.

Since signing up to the Principles for Responsible Banking we have continued to implement the principles of alignment, impact and target setting, clients and customers, stakeholders, governance and culture, and transparency and accountability.

We have published regular update reports detailing the implementation of the principles. In our latest report published in May 2025, progress on targets set to further the Bank's achievements in key identified high impact areas of climate as well as financial health and inclusion have been disclosed.

For further details regarding the Bank's progress with regards to the Principles for Responsible Banking please refer to the report provided in the link below.

Financial Health and Inclusion

In order to support our commitment to embedding a positive impact on Financial Health and Inclusion, we have committed to a number of specific targets using the UNEP FI target setting methodology:

- We aim to deliver training to all colleagues on financial health and inclusion;
- The Co operative Bank is targeting to reach 75 % digitally active customers by 2028, increasing 1.5 % annually to reach this target.



Read our Third Update
Report February 2025



PRB Signatories



ESG in Investor Relations

Investment Management

As the UK's original ethical bank, we want to be as clear as possible with both our investors and our customers about how we operate as a business and communicating our commitments to ESG is a key part of our work with investors.

- ESG is regularly discussed as part of direct engagement;
- ESG is covered in every financial market update and quarterly investor presentation to the market.

[Read more about our approach
to Investor Relations](#)



Our policies and external references

Our ESG Policies

Code of Conduct Policy

All colleagues, as well as agency workers and contractors who undertake activity on behalf of the Bank, are covered by the Bank's Code of Conduct requirements.

The Code of Conduct details the required individual behaviour to ensure we are operating in line with our Ethical Policy and Guiding Values, delivering the right customer outcomes, taking appropriate attitudes to risk and complying in full with regulatory requirements.

The Code of Conduct has four sections:

1. Upholding our Ethical Policy and Guiding Values

The Code of Conduct incorporates the areas of responsibility outlined in our Ethical Policy and Guiding Values. Together, these define the behaviours and conduct that the Bank expects from all colleagues. The Ethical Policy includes the Co-operative values of self-help, self-responsibility, democracy, equality, equity and solidarity. These values have been enshrined in the Bank's Articles of Association. Everyone who works for the Bank has a responsibility to apply the Ethical Policy to their areas of responsibility and to live up to the promises we have made to our customers.

2. Good Customer Outcomes

Colleagues are expected to at all times act in the customers' and the Bank's interests.

3. Risk

Managing both internal and external risk is essential to enable the Bank to remain financially strong and to achieve its objectives. We take steps to reduce the risk of fraud by colleagues, customers or members of the public.

4. Regulation

Colleagues must be fully aware of all responsibilities to comply with applicable legislation, rules, and codes of practice or conduct laid by external authorities including the Financial Conduct Authority (FCA) and the Prudential Regulation Authority (PRA).

You can read our full Code of Conduct on our website.

Read our latest Code of
Conduct here



Bullying and Harassment Policy

Including Discrimination, Victimisation and Exclusion

The Bank's policies and approach are designed to develop a work environment in which bullying, harassment, discrimination, victimisation and feeling isolated are unacceptable, and where colleagues have the confidence to challenge inappropriate behaviour without fear of reprisal. Equality of opportunity regardless of personal demographics and fostering a culture of inclusivity is integral to our brand. The Bank has a zero tolerance against discrimination, victimisation, harassment and bullying.

The Bank's Bullying & Harassment policy and annual mandatory training for all colleagues on Inclusion and Diversity seeks to help colleagues understand inclusion and diversity and why it is important; the Bank's zero tolerance approach to harassment, bullying, discrimination and victimisation; as well as how to practice everyday inclusion and how to call out unacceptable behaviour when colleagues see it.

Where it is found that bullying, harassment, discrimination or victimisation has occurred, action will be taken in line with our Disciplinary Policy.

The Bank has provided bullying and harassment training for some leaders with plans to consider additional training to ensure appropriate action is taken when issues are raised by colleagues.

[Read our Bullying and Harassment Policy](#)



Our Policies

Diversity and Inclusion Policy

The concept of diversity encompasses acceptance and respect. It means understanding that each individual is unique, and recognising our individual differences. These differences include, but are not limited to gender, pregnancy and maternity, ethnicity, culture, age, physical and mental ability, sexual orientation, gender identity, religion or belief, marital and civil partnership status, education and those with a caring responsibility.

We recognise the importance that equality legislation has to play in promoting equality and eliminating unlawful discrimination, but seek to exceed our legal obligations and to provide an inclusive environment for all.

We understand that simply having diversity in our work force is not enough; we must create an inclusive environment where all people can contribute their best work.

Inclusion is engaging the uniqueness and talents, beliefs, backgrounds, capabilities and ways of working of individuals, joined in a common endeavour, to create a culture of belonging, in which people are valued and respected.

By embracing employee inclusion and diversity, we mean that talent, contribution, commitment are key to achieving our aims, and we know we can draw on the best of these from all backgrounds..

[Read our Diversity and Inclusion Policy here](#)



[Read more about how we champion D&I in our Sustainability Report, p.27](#)



Whistleblowing

Concern at Work Policy

As a Bank we are committed to maintaining ethical, as well as professional standards in line with our legal and regulatory obligations. We take any failure to comply with our ethical, professional, legal or regulatory standards seriously. We believe individuals should escalate any concerns they have through appropriate routes. Doing so helps correct wrongs, fix problems or highlight risks. The investigation of any concerns raised will, where requested and so far as possible, be undertaken confidentially, colleague's will not be treated unfairly or be at risk of losing their job if they raise genuine concerns, whether they use the Bank's normal risk processes or the Concern at Work (whistleblowing) escalation routes.

Colleagues, customers or third parties can raise concerns at any time to the independent Major Investigations team about an incident that has already happened, is happening now, or they believe may happen in the near future. An independent whistleblower reporting hotline is available to all colleagues 24/7 and, where appropriate, the Bank's appointed Whistleblowers Champion can be contacted directly by phone. Anonymous reporting is possible and reports are treated confidentially.

The Bank's policy includes structures to process whistleblowing reports. The Chair of the Joint Audit Committee is the organisation's Whistleblowing Champion and is responsible for ensuring and overseeing the integrity, independence and effectiveness of the Bank's whistleblowing policies and procedures.

The Concern at Work Policy also sets out a structure which details the responsibilities of all persons, line managers, the People directorate, the Bank's 2nd Line of Defence, the Major Investigations team, the Bank's Legal team and the Board level Joint Audit Committee.

Due to the low number of cases, types of misconduct and any measures taken have not been included to ensure personal confidentiality is maintained.

You can read our Concern at Work (Whistleblowing) Policy Overview on our website*:

[Concern at Work Policy Overview](#)



**As The Co-operative Bank solely operates in the UK, the Concern at Work (Whistleblowing) Policy is only available in English*

Conduct Risk

Acting on behalf of our customers

Colleagues are expected to act at all times with integrity and honesty in their business and personal dealings to protect the interests of our customers and the Bank.

Colleagues are expected to act at all times conscientiously and with due skill, care and diligence when carrying out every aspect of their role as an employee.

Conduct Risk

The Conduct Risk Policy also reflects the FCA's Consumer Duty requirements, enhancing the Bank's attention to delivering good consumer outcomes through a more data-led, outcomes focussed approach. Implementation has led to positive enhancements of the Bank's customer centric product and service governance frameworks and associated outcomes management information.

"Conduct Risk" is in simple terms about putting the customer at the centre of what we do to achieve good customer outcomes. It is essential that colleague's consistently act in line with the Bank's Conduct Risk Policy and the Bank's Values to ensure that they:

- Put the customer first.
- Put themselves firmly in our customers' shoes before they act.
- Understand how they affect the experience we create for our customers.
- Play their part in ensuring good customer outcomes.
- Be reliable, flexible and understand without doubt we exist for our customer.
- Understand our products and how they operate.
- Don't assume to know what our customers want.
- Don't ignore customer feedback.

Following these requirements will help keep the customer at the heart of how we operate and help us meet expectations set out by the Financial Conduct Authority and Prudential Regulation Authority.

You can read an overview of our Conduct Risk Policy and our 2023 Code of Conduct on our website:

Conduct Risk Policy
Overview



Code of Conduct Policy



Compliance Procedures

Risk Assessments and Audits

Compliance Risk Assessments and Audits

Every year, the Compliance function completes regular risk assessments and audits according to the Compliance Assurance Annual Plan. The primary objectives of these assessments are the:

- Validation of the effectiveness of the control activities performed by the Bank's first line Risk management function;
- Provision of assurance across compliance and financial crime areas as required by Senior Management Function responsibilities.

Bank activities within the annual plan are selected through consideration of the following key criteria: Critical Customer Interactions, Strategic Goals, Key Risks, Regulatory Priorities and Stakeholder Feedback.

There is a strong focus on customer-centric assurance activity within our Compliance Assurance Plan. Outcome testing, regulatory, product and conduct risks are considered through different assurance activities to assess whether good customer outcomes are being delivered, to identify customer harm, and through the identification of improvements to processes and controls, enhance the customer experience.

The Compliance Assurance Plan is approved by our Director of Compliance, and is subjected to review and challenge by our Operational, Compliance & Financial Crime Risk Oversight Committee.

Risk Management Framework Assurance

As well as Compliance Assurance activities, our second line of defence Risk function carries out quarterly reviews of specific Risk Management Framework (RMF) areas to ensure compliance with our Operational Risk policy. These risk assessments and audits are carried out by a separate team to the Compliance Assurance function and specialise in specific Risk types to maintain the integrity of the Risk Management Framework.

Compliance Procedures

Code of Business Ethics

Business Ethics

All employees at the Bank must complete annual mandatory training on the Bank's Code of Conduct, as referenced earlier in this document. Further, all Bank employees provide confirmation that they have read and understood the Code of Conduct through this training course.

Corruption

The Bank has zero tolerance for financial crime and this includes money laundering, terrorist financing, financial sanctions breaches, proliferation financing, fraud (internal and external), tax evasion or the facilitation of tax evasion, bribery & corruption, modern slavery and human trafficking and will not knowingly do business with or facilitate the activities of individuals or entities that it believes to be engaged in these.

Whistleblower Policy

Our Whistleblower Policy details our anonymous and confidential reporting channels for employees which is also provided to our suppliers.

Antitrust violations

The Bank complies with all relevant legislation as per its Code of Conduct which means, as well as compliance with the FCA and PRA's regulatory procedures and policies, it has a zero tolerance for non-compliance with rules laid out by the Competition and Markets Authority (CMA) which covers relevant anti-competitive practices such as cartels and abuse of dominant market power.

Validity of financial information

The Bank utilises external third party assurance to ensure accurate, valid, reliable, timely, relevant and complete financial reporting. Assurance reports can be found in both the Bank's Annual Report & Accounts as well as our Sustainability Report.

Third Party Supplier Policy

For information regarding our Third Party Supplier Policy and due diligence process, please see details on our Sustainable Procurement and Supplier Policy as well as our Third Party Supplier Policy:

Read our Third Party Supplier Policy and other policies
on our Policies page



Our Policies

Financial Crime

The Bank has zero tolerance for financial crime and this includes money laundering, terrorist financing, financial sanctions breaches, proliferation financing, fraud (internal and external), tax evasion or the facilitation of tax evasion, bribery & corruption, modern slavery and human trafficking and will not knowingly do business with or facilitate the activities of individuals or entities that it believes to be engaged in these.

The Bank has no appetite for actions that result in a breach of legal or regulatory requirements leading to censure or financial penalty and will maintain compliance with its legal and regulatory obligations. The Bank enforces the following policies, which collectively provide a framework to protect the Bank and our customers from the harms of financial crime. These policies are underpinned by mandatory minimum standards, which drive our internal controls.

- Anti Money Laundering (AML), Counter Terrorist Financing (CTF), Proliferation Financing (PF) & Financial Sanctions (FS)
- Fraud Risk Policy, which includes an Internal Fraud & Anti Bribery & Corruption (ABC) Control Standard (including failure to prevent fraud offence) and an External Fraud Control Standard (including assessment against Payment Systems Regulator (PSR) rules for mandatory reimbursement for victims of APP fraud)

These policies and the supporting control standards are subject to regular review and approval at the relevant Risk Reporting Committees.

Each year the Bank undertakes a risk assessment of the AML, CTF, PF & FS, Internal Fraud & AB&C (including the facilitation of tax evasion) and External Fraud risks that are relevant to the Bank and its business model. An update is provided to our Risk Reporting Committees.

To complement our individual policies we also have a section on AML, fraud, including AB&C and gifts and hospitality, in the colleague Code of Conduct Policy providing further guidance especially around conflicts of interest.

Externally, we have a section on AB&C on the Bank's website which outlines the Bank's stance on Bribery & Corruption and confirms that we conduct our business fairly and lawfully and will not tolerate crime offences such as Bribery & Corruption in any guise.

You can read our full Financial Crime Policy Overview on our website:

Financial Crime Policy
Overview



Our Policies

Data Privacy and Security Policy

Protecting the privacy of our colleagues and customers is extremely important to us. The Bank is committed to ensure that we abide by the Data Protection Act 2018, the UK GDPR, the Privacy and Electronic Communications Act and the Data Use and Access Act (DUAA) 2025; which are the laws that set the minimum standards for data protection. We look to exceed all standards where possible/practical. The bank's Data Privacy and Security policies relate to 100 % of the business and include a full set of controls and risk mitigation measures for Cyber security (covering both Operational and technical areas of concern). It also includes a series of Privacy notices that cover personal data relating to Customers (both Retail and Business), Colleagues and Applicants.

Data protection law requires us to manage all personal information in accordance with the data protection principles. In particular, we are committed to:

- Obtaining user data through lawful and transparent means, with explicit consent of the data subject where required.
- Collecting and processing user data that is limited to the stated purpose.
- Requiring third parties with whom we share data to comply with our Policies on data.
- Notifying data subjects in a timely manner if there is a change in policy or data breach.

To support this we detail clear terms involving the collection, use, sharing and retention of user data including data transferred to third parties through the following policies and principles which cover all parts of the Bank's operations:

Policy/Principle	Key Components
Privacy Notice	Displayed on the website, mobile site, in all branches and is available in paper form on request from the bank.
Third Parties	Any 3rd parties that we deal with have a contractual obligation to the bank and as part of that there is a data protection schedule in place that calls out their requirements as described in the legislation.
Applicant Privacy Policy	The Bank will only gather and process the relevant type and amount of personal information required, allowing us to help recruit and then manage candidates employment with us.
Broker Privacy Notice	The Bank will only gather and process the relevant type and amount of personal information required, allowing us to help on-board the brokerage and maintain a business relationship ongoing.
Colleague Privacy Notice	The Bank will only gather and process the relevant type and amount of personal information required, allowing us to help recruit and then manage candidates employment with us.
Changes to Privacy Notice	We will update this notice to reflect changes to our information practices. If we make any material changes we will notify you by means of a notice on our website prior to the change becoming effective. We encourage you to periodically review co-operativebank.co.uk/global/privacy-and-cookies for the latest information on our privacy practices.

Data Privacy Programme

Managing our data risk

The Bank's stated policy in respect of Data Privacy, Protection and Security is that it fully abides by all the prevailing legislation in the UK. This includes, but is not limited to the, Data Protection Act 2018, The UKGDPR and the Privacy and Electronic Data Regulation (PECR). To monitor this compliance it uses a number of artefacts on a regular basis to manage compliance and be able to evidence such compliance to the UK Regulator (ICO) as required. The 2 key artefacts are:

Data Protection Impact Assessment (DPIA):

- The DPIA is a mandated process by ICO that looks for an organisation to call out all elements of the personal data lifecycle during any change that is implemented;
- A DPIA is completed for all change that is undertaken its is first completed during the "Initiate" phase of the project and for any projects that are consider high risk is revisited at all stage gateways through to delivery;
- If the DPO is not satisfied with the input in a DPIA it has the full power to stop the change until the right safeguards are in place and visible;
- At any given time there will be up to 200 DPIAs in force across the organisation.

International Data Risk Assessment (IDRA):

- When the bank enters into a restricted transfer of data outside the UK it will only do so when an IDRA (an ICO mandated audit) is completed;
- The assessment looks at both the Operational and Procedural process of the foreign contractor (Importer) to ensure that similar privacy and security measures to those required in the UK are in place;
- It also does a detailed assessment of the political outlook in the importing country, specifically to ensure that the human rights of the individuals whose data is shared are protected - inputs into this include both HMFO and NGOs (Amnesty, Oxfam etc.).

Data Breaches:

- Data breaches are managed within the banks standard Risk Management Framework (RMF). Dependant on the circumstances highlighted within this process breach may be raised with the regulator - ICO. The bank received confirmation that the last breach that was reported with ICO was dealt with in an appropriate manner and, following initial notification, ICO agreed that no further action was required and that the bank had controls and a RMF that was appropriate for the data that it manages.

Data Privacy Programme

Protecting data security rights

Data Request Management:

- To support our historical commitment to human rights and to address key data protection concerns, the Bank has published an Information and Data Policy Overview which summarises our internal risk policy and explains that how we conduct regular risk assessments linked to data privacy.

Key activities undertaken to enshrine an individuals Data Security Rights and Protections:

- The bank completes DPIA and IDRA's wherever they are required within the change lifecycle and the DPO will stop or force change onto projects where data protection is not visible/evidential;
- The bank respects all individuals human rights in through the audit/assessment process outlined within this paper;
- All customers, Colleagues and Applicants are made fully aware of how their data is processed via the various Privacy Notices that it holds and makes available to all on its numerous websites/Intranets or by hard copy on request – when appropriate all relevant individuals are made aware of changes to the Privacy Notices;
- Managerial responsibility for data requests made by government agencies/Police or local government to ensure that all requests are legitimate for the reason they are requested and that the requests are made in line with all prevailing legislation;
- Ensuring that all individuals have access to their full data protection rights including access to data, the rights to delete, change or restrict the use of their personal data and full transparency around how the bank process such information;
- Full breach management process in place to ensure that any breaches are managed in line with ICO guidance;
- In the highly unlikely event that If a breach was found to create human rights violations as a result of the company's data sharing practices, suitable remedies would be found and implemented.

Read our Information and Data
Policy Overview



Data Request Management

Managing Data Privacy

Protecting the privacy of our colleagues and customers is extremely important to us. The Bank is committed to ensure that we abide by the Data protection Act 2018, The UK GDPR, and the Privacy and Electronic Communications Act, which are the laws that set the minimum standards for data protection. We look to exceed all standards where possible/practical.

Data Subject (Customer) Requests

The Bank complies with all requests from data subjects for copies of the data that the bank holds on them including, but not limited to, account records, statements of accounts, application forms, CCTV coverage and call recordings.

Non-data subject requests

The Bank abides by all relevant legislation and on occasions this will require the Bank to produce records relating to data subjects (customers or colleagues) when required to do so through a law instrument that is called out in the Data Protection Act 2018 or the UK GDPR.

All such requests must be accompanied by a duly authorised order that states which specific piece of legislation is being used to make the request and all these orders are checked to ensure that any data released is in line with the regulation.

The Bank is primarily subject to UK law and to date there have been no requests from foreign agencies for data relating to customers or colleagues. If such a request was received the Bank's Data Protection Officer and legal team would liaise closely with the Information Commissioners Office to ensure that the rights and freedoms of all data subjects are protected.

Click here to find out more
about our privacy policy



*Any queries on the Bank's approach to Data Privacy can be addressed to the Bank Data Protection Officer data.protection@co-operativebank.co.uk

Data Request Management

Managing Data Privacy

Policy commitment to respect human rights in data management

We do not have a specific policy relating to the protection of human rights within its policy control framework but this commitment is explicit in that it respects, without exception, absolute compliance with all applicable laws within the UK including international legislation that the UK government has signed up to - this includes the UN Convention on Human Rights. Additionally, when the bank agrees to transfer personal data outside of the protected EEA/EU area it carries out strict auditing of both the companies it is exporting to as well as the political regimes within the countries to ensure that there can be no human rights challenges through such exportation - this is in line with the guidance given by the UK regulator (ICO) in this area. No personal data would be exported to a country that does not meet the required standards as set out by the regulator. On request, we can supply a copy of the template used to assess the risk of data being transported to a country where there are known human rights issues however this is not a document that is shared publically.

Managerial responsibility for government data requests oversight

All requests by the UK government are subject to challenge and in addition to calling out the exemption that they are using to request the document requested (fraud, criminal, health reasons etc.) they must supply the supplementary legislation that they are using to do so. For example, "We require information on this person due to criminal behaviour and the legislation that allows for this request is the Proceeds of Crime Act 2002".

Regular reporting on compliance with any government data requests

Regulatory Contact Principles: The Bank is required to provide a number of regulatory returns either through regulatory reporting system such as BEEDS and RegData (previously Gabriel) or directly via email. Senior Management Function Holders retain responsibility for meeting their periodic reporting obligations. Functions responsible for supply of regular reports and returns must maintain appropriate procedures and return schedules with clear responsibilities for data production, review and sign-off as well as delegated authorities for data submission. The Director of Risk Governance, Regulatory Affairs and Prudential Oversight retains responsibility for oversight of submissions and will escalate any failure to meet periodic reporting requirements to the Chief Risk Officer.

Customers are made aware of their data protection rights when they first apply for a product and then periodically when any significant changes are made to the Privacy Notices. A copy of our Privacy Notices is available 24/7/365 on the bank website or by hard copy if requested. The rights enshrined in the Privacy Notices align exactly with those required within the UK Data Protection legislation.

Our Policies

Bribery and Corruption

The Bank is committed to acting with integrity and fairness in all its business dealings and commercial relationships.

Fraud

We have a Fraud Policy which includes Anti Bribery & Corruption (AB&C) and a specific Internal Fraud and AB&C Control Standard. Both are reviewed on an annual basis and signed off at the relevant Risk Committee (OCROC).

All colleagues are required to complete our annual Fraud mandatory training which includes a module on AB&C. This reinforces the Bank's zero tolerance approach to internal fraud, bribery and corruption.

Each year the Bank undertakes an AB&C and Facilitation of Tax Evasion risk assessment and an update is provided to our Risk Reporting Committees.

Gifts & Hospitality

We have a Gift & Hospitality Procedures document which must be adhered to and followed by all colleagues. Our gifts and hospitality levels are reviewed quarterly by our Risk Function with confirmation of accuracy provided and reported to our Risk forum.

To compliment our individual policies we also have a section on fraud, including AB&C and gifts and hospitality, in the colleague Code of Conduct Policy providing further guidance especially around conflicts of interest.

Externally, we have a section on AB&C on the Bank's website which outlines The Bank's stance on Bribery & Corruption and confirms that we conduct our business fairly and lawfully and will not tolerate crime offences such as Bribery & Corruption in any guise.

You can read our full Financial Crime Policy Overview here:

Financial Crime
Policy Overview



Our Policies

Responsible Marketing

As an ethical bank, we are committed to Responsible Marketing practices.

- While some of our emails keep you updated on essential information to do with your account (such as changes to terms and conditions and fees and charges), opting into marketing emails means you can receive additional information about our products and services, support with managing your money, and updates on how we're putting our values and ethics into action.
- Careful consideration is given to the number of communications received by customers and we work hard to ensure that our customers only receive information that we believe is relevant to them personally.
- In accordance with the Financial Conduct Authority Consumer Duty regulation and updated Information Commissioner's Office guidance, we focus on communications that are in the customer's best interest.
- In line with best practice, our minimum font size is 6pts, however, we work to ensure that all of our customer communications are legible. Customers who are blind or partially sighted can request larger print sizes.

[Read our Responsible Marketing Policy here](#)



[Read more about our range of accessibility tools to help you with banking](#)



Our Policies

Our Advertising Policy Overview

The Co-operative Bank's advertising is managed by a 3rd party media buying agency, Omnicom Media Group (OMG) UK who have oversight of our advertising approach.

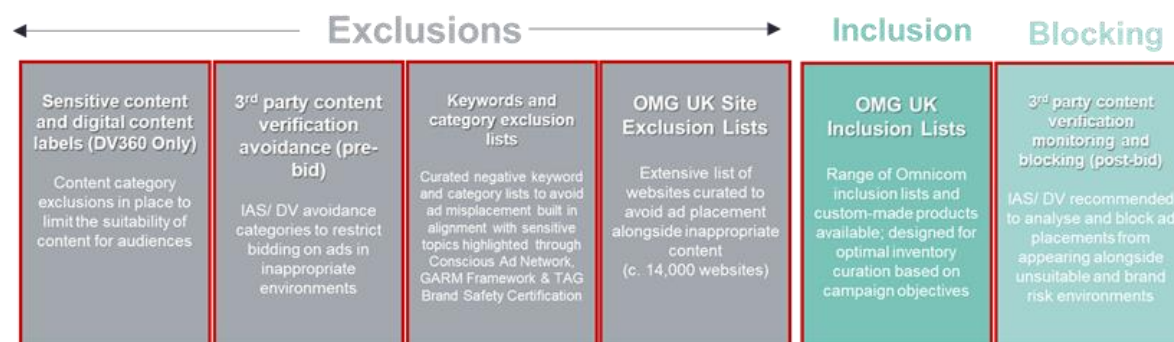
As the Original Ethical Bank we hold our selves and our agencies to certain advertising standards that are aligned with our Ethical Policy.

OMG UK are committed to the promotion of media ad placements that are non-fraudulent, viewable, brand safe and brand suitable that delivers high user engagement to support effective and efficient media across quality platforms, publishers and content".

We ensure that all our media placements following our Brand Safety requirements:

1. **Brand unsafe environments** cover topics that are potentially harmful for a brand's reputation and avoided to ensure media investment is not shown alongside and in support of these topics i.e. hate speech
2. We also identify **brand unsuitable environments** meanwhile are more subjective topics that may differ by industry and brand that allow an advertiser to restrict media investment amongst content that is least appropriate for a brand i.e. gambling or certain newspapers that we boycott as part of the Stop Funding Hate campaign
3. Across is the process that OMG UK follow before placing any advertising.

OMG UK take brand safety and suitability online very seriously and have invested in developing strict protocols and proprietary products to minimise our clients' exposure to inappropriate content.



*Note not all DSPs, formats and routes to market support all measures, but OMG UK will apply where it is possible to do so and fits within advertiser goals and campaign objectives
Despite these changes and safeguards, no system is 100% perfect and there is still a risk of showing ads against unwanted content.

Read more about
their approach here



Our Policies

Political Involvement Disclosure Policy

The Co-operative Bank prides itself in being an ethical bank, and as such our customers rightly expect us to conduct our business with honesty and transparency. This expectation extends to our relationships with public institutions and individuals of political importance. As a business, we are strictly politically neutral and have commitments in place to ensure that we uphold our neutrality. We publicly disclose all formal meetings on behalf of the Bank between political figures and members of the Bank's Board and Executive, as mandated by our Ethical Policy and update this quarterly in our Political Involvement Disclosure Policy. This Policy states that we will never donate to a political party, politician or party political campaign group.

Read our Political Involvement
Disclosure Policy here



Campaigning for the causes that matter to our colleagues and customers

Our unique customer-led Ethical Policy is informed regularly by the views of our customers, who tell us the issues that matter most to them through our Values and Ethics Poll. In our last poll in 2021, protecting the environment was the most important issue that customers wanted us to act upon. This poll of approximately 50,000 customers mandates us to campaign for environmental change, which is why we are proud to support organisations like Zero Hour and Shelter who are working to address the UK's response to the climate crisis and the housing crisis.

Read our latest Ethical
Policy here



For more information on our ESG
Approach, please get in contact by
clicking here



For any queries, please contact
pressoffice@co-operativebank.co.uk