



# UN GLOBAL COMPACT COMMUNICATION ON PROGRESS

2018


Period covered 1 January to 31 December 2018  
Date submitted to UN Global Compact website 3 May 2019



# ABOUT US

## Our purpose

Our purpose is to Help Britain Prosper. We are creating a responsible business that better meets our customers' needs and a culture where our colleagues put customers first. This is key to our long-term success and to fulfilling our aim to become the best bank for customers, colleagues and shareholders.


 Find out more about our Group  
[2018 Annual Report and Accounts](#)

**Lloyds Banking Group is a UK financial services provider with around 26 million customers and a presence in nearly every community.**

Our main business activities are retail and commercial banking, general insurance and long-term savings, provided under well recognised brands including Lloyds Bank, Halifax, Bank of Scotland and Scottish Widows.

Our active supply base comprises approximately 3,500 suppliers, the majority of which are in professional services sectors and are located in the UK, other European countries or North America. More information about the Group and our strategy is available in the 2018 Annual Report and Accounts.

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# STATEMENT FROM THE CHIEF EXECUTIVE

Our strategy is to be the best bank for customers, colleagues and shareholders. As a UK focused retail and commercial financial services company, our success is inextricably linked to the UK economy, and we believe we have a responsibility to help address some of the social, economic and environmental challenges that the UK faces. This is why we remain committed to operating sustainably and responsibly and our purpose to help Britain prosper.

I am pleased to reaffirm Lloyds Banking Group's support for the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption. This third Communication on Progress shares an update on the progress we have made in integrating the principles into our business strategy, culture and daily operations.

I look forward to providing you with a further update on our progress in 2020.

Yours sincerely,

António Horta-Osório  
Group Chief Executive





# HUMAN RIGHTS

## Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights; and

## Principle 2

Make sure they are not complicit in human rights abuses.





## Our approach

**We aspire to conduct business in a way that values and respects the human rights of our colleagues, customers, suppliers and those of the communities in which we operate. We understand that the financial system has a unique interaction with human rights and we have policies and governance processes in place to mitigate associated risks.**

In 2015, we welcomed the UK Modern Slavery Act and are committed to doing business responsibly, taking meaningful steps to ensure that workers' fundamental rights and freedoms are respected. We do not tolerate slavery, trafficking or forced labour in any part of our business or supply chain.

You can read more about our approach in our [Modern Slavery & Human Trafficking Statement 2018](#).

We aim to align our activities and policies with international best practice and recognised standards. We adhere to the United Nations (UN) Declaration of Human Rights as well as the rules and regulations of each country in which we operate. As signatories to the UN Global Compact, we align with its Ten Principles and also support the UN's Guiding Principles on Business and Human Rights which we use as a framework to understand our human rights impacts, to define our responsibility and approach to respect human rights, and to guide the development of our [Human Rights Policy Statement](#). In addition, we support the UN's wider development agenda through the UN Sustainable Development Goals (SDGs).

Our Helping Britain Prosper Plan supports the aims of seven key SDGs (4 Quality Education, 5 Gender Equality, 7 Affordable and Clean Energy, 8 Decent Work and Economic Growth, 9 Industry, Innovation and Infrastructure, 10 Reduced Inequalities and 12 Responsible Consumption and Production), and we are committed to our role in contributing to their continued development and success. In 2018 we developed an enhanced Sustainability Strategy which overtly supports two of the SDGs.

More information on this is available on page 20 of the [2018 Annual Report and Accounts](#). For information on the more specific labour standards that we comply with, please refer to the Labour section in this report.

We understand that human rights encompass more than just the individual and take into account social, ethical and environmental issues in our investment, lending and service operations. Our corporate governance structure ensures that colleagues are supported to work responsibly and manage risk effectively. This structure includes our Board and our Board-level Responsible Business Committee. It extends to every part of our business through our Group Executive Committee and Executive-level Committees.

We have a number of internal policies and procedures that reflect our commitment to operating responsibly and ethically both at a business and an individual level. These include our Ethics and Responsible Business, Colleague, Sourcing, Speak Up (whistleblowing) and Anti-Bribery Group policies. These Group Policies, associated procedures and mandatory training are reviewed annually, alongside our Code of Responsibility and Code of Supplier Responsibility, and form part of the governance of the Group's Policy and Risk Management Frameworks.

**We do not tolerate slavery, trafficking or forced labour in any part of our business or supply chain.**



Our [Code of Responsibility](#) (the Code) provides clear guidelines for doing business fairly and responsibly, in line with our Group Values: putting customers first; making a difference together; and keeping it simple. The Code encourages colleagues to report, through Speak Up or to the Group's Colleague Conduct Management Team, any actions that are unsafe, unethical, unlawful, or not in line with Group Policies. We revised the Code in 2017 and plan to review it again in 2019. Employees are required to review the Code and complete Speak Up training every year as part of the mandatory training curriculum. After training they are expected to understand their responsibilities and to adhere to them every day.

Our [Code of Supplier Responsibility](#) highlights the importance we place on respect for human rights across all our business relationships. Whilst we expect our suppliers to have their own whistleblowing policy and facility, suppliers and their workers can also report any incidents through our confidential Speak Up line. An independent supplier, Expolink, manages the Speak Up line and we have worked with Expolink to ensure that, if instances of modern slavery or other human rights abuses are reported, they are identified, and effectively and sensitively investigated.

## Outcomes

Best Bank for Customers mandatory training completed by 85 per cent of colleagues in 2018, to confirm they have read and understand their responsibilities under the Code of Responsibility

In 2018 colleagues reported 378 Speak Up concerns, of which 167 were progressed to investigation. 49 per cent of the concerns investigated were upheld and remedial action taken where appropriate

Zero cases identified of human rights abuses in 2018. No reported incidents of human rights breaches, slavery or trafficking from our suppliers in 2018

Annual Anti-Money Laundering mandatory training completed by 97 per cent of colleagues in 2018. This training included references to human trafficking and provided a specific modern slavery case study as an example

In August, Lloyds Banking Group signed a three-year partnership agreement with the City of London police to help fight economic crime in the UK, including those relating to human trafficking and modern slavery. During this partnership, the Group will contribute £1.5 million to related projects

Training and guidance for specialist Group Sourcing and Supplier Manager colleagues on the requirements of the UK Modern Slavery Act and the risks of slavery and human trafficking. The content from this training is also available for colleagues to replay and to download for future reference

Training on specific commercial sectors was delivered in March 2018 to Commercial Banking colleagues and 1,100 clients to raise awareness of the issue and support customers to be more aware. This included an overview of sectors in which the risk of forced labour may be higher such as agriculture, car washes, nail bars, hospitality and construction

 **More information about our strategy, targets and performance is available online**  
[Modern Slavery & Human Trafficking Statement 2018](#)  
[Human Rights Policy Statement](#)  
[2018 Annual Report and Accounts](#)



# LABOUR

## Principle 3

Businesses should uphold freedom of association and the effective recognition of the right to collective bargaining;

## Principle 4

The elimination of all forms of forced and compulsory labour;

## Principle 5

The effective abolition of child labour; and

## Principle 6

The elimination of discrimination in respect of employment and occupation.





## Our approach

**At Lloyds Banking Group, our efforts to be a responsible business require building a culture of integrity and respect. We do not tolerate slavery, trafficking or forced labour in any part of our business or supply chain.**

We aim to align our activities and policies with international best practice and recognised standards. We are either a signatory to, or abide by, the principles of a number of international and national codes and standards relating to responsible business practice. These include: The Equator Principles, the UN Principles for Responsible Investment, the UN Global Compact, the UN Universal Declaration of Human Rights, and the ILO (International Labour Organisation) labour standards.

As outlined in the human rights section of this report, we have a number of internal policies and procedures that reflect our commitment to operating responsibly and ethically. Our Code of Responsibility applies to all colleagues, contractors and temporary employees and provides an overarching framework to ensure the highest possible standards of behaviour each and every day, including in relation to diversity and inclusion.

Our Group Inclusion & Diversity strategy is led from the very top, with Group Executive Committee (GEC) members championing the agenda. Key focus areas – gender, ethnicity, disability, LGBT and agility – are each sponsored by individual GEC members. Through a range of initiatives and strategies we work hard to ensure Lloyds Banking Group is inclusive for everyone.

In our internal operations, our Pre-employment Vetting Policy and Group Wide Vetting Standards, apply to all permanent and non-permanent employees that we recruit, including temporary staff and contractors. The Pre-employment Vetting process upholds our respect for labour rights. It includes the review of individuals' proof of identity, address, and right to work in the UK.

We want to ensure that every colleague feels valued and empowered to thrive. The Group has approximately 65,000 employees and recognition agreements with two trade unions, Accord and Unite, which collectively negotiate on behalf of 98 per cent of our UK employees and approximately 95 per cent of employees worldwide. The Living Wage Foundation has accredited the Group as a Living Wage Employer and we review our pay rates annually to ensure minimum rates are above statutory minimum wage requirements. We have worked, and continue to work with, third-party contractors and suppliers to ensure that they operate in line with our commitments.

We seek to enable colleagues to achieve a positive balance between their work and their lives outside of work and provide a number of opportunities, such as flexible working, to help them do this. We work to safeguard and promote colleague wellbeing, by ensuring a psychologically sound working environment to help prevent work-related illness and by providing support and health advice in times of need. Our Mental Health Strategy supports colleagues and leaders through a Mental Health Resource Centre and this year we stepped up mental health training for colleagues at all levels. We are also committed to achieving the highest standards of health and safety and fire protection for our colleagues, customers and anyone who visits our premises.

As a founder member of a group of leading employers supporting workforce agility, agile working is at the heart of Lloyds Banking Group's strategy to work more efficiently for the benefit of our customers, colleagues, and the business. Having switched in 2015 to an agile working policy, over 40 per cent of colleagues now work in an agile way. In 2018, we introduced our Workforce Agility Team Led Toolkit and continue to embed agility into our recruitment processes. Our commitment to agile working has been recognised and we were named a Top 10 Employer for Working Families in 2018 for the fourth consecutive year and Top Employer for Flexible Hiring at the Timewise Power 50 Awards.

**We do not tolerate discrimination in respect to employment and occupation. We recognise that everyone is different and we are working hard to build an inclusive Group that reflects the diversity of modern Britain.**





In 2018, we became the first FTSE100 company to set public goals to increase Black, Asian and Minority Ethnic (BAME) representation at all levels. And in October, we signed the UK Government's Race at Work Charter and already meet and exceed its principle requirements.

We also launched our Sponsoring Leaders programme, enabling women in senior roles to champion the potential of women in more junior roles. The promotion rate for the 100 colleagues who completed the programme in 2018 was around five times that of non-participants.

We are committed to being a more disability confident employer, with 1.7 per cent of colleagues disclosing a disability in 2018 via our HR system. The Department for Work and Pensions designated the Group as a Disability Confident Leader for our inclusive recruitment process and in November, we won a 'Nothing about us without us' Disability Smart Award, recognising the way we gather insights about disability from colleagues, customers and charities, and then use them to inform our decisions. As a member of the Business Disability Forum, we are proud to have retained our Gold accreditation in the Disability Standard and more than 24,000 colleagues have completed our industry leading workplace adjustment process to date.

We offer bespoke development programmes and recruitment processes for colleagues and job applicants with disabilities. We aim to appoint the best candidate into any role and give full and fair consideration to job applications from those with disabilities, and are unbiased in the way we assess, select, appoint, train and promote people. We offer a guaranteed interview scheme for candidates who declare a disability and meet the minimum requirements of the role.

We continue to run a Disability Work Readiness Programme (DWRP) in partnership with Remploy, one of the largest disability-focused work experience initiatives in the financial services sector. This programme has evolved over the last four years, and as at December 2018 a total of 939 placements have been completed, with 200 people moving into employment as a direct result of attending a DWRP placement, 34 of whom secured employment within Lloyds Banking Group.

## Outcomes

In 2018 the Group was the first FTSE100 company to set public goals to increase Black, Asian and Minority Ethnic (BAME) representation at all levels

Over 35 per cent of senior roles are held by women, making progress towards our target of 40 per cent by 2020

Around 50 per cent of colleagues belong to one of our five diversity networks

88 per cent of colleagues believe that the Group is an inclusive place to work

Over 40,000 colleagues have completed training on mental health, and we are training 2,500 colleagues to become mental health advocates by 2020

Enrolled 200 leaders in our new Optimal Resilience Leadership Programme, which covers personal, mental and physical wellbeing and are now working on extending this to the next level of 2,000 senior managers

We were a top ten Trans-Inclusive employer and fifth employer overall in the Stonewall Top 100 2018, the highest ranked financial services company in the UK

Named the overall Outstanding Employer at the inaugural Investing in Ethnicity awards; and once again, a Top 10 Employer for Working Families, and Times Top 50 Employer for Women

Retained our Business Disability Forum (BDF) Gold Standard, and hold Disability Confident Leader status with the Department for Work and Pensions

Set to achieve Autism Friendly Bank and Employer accreditation from the National Autistic Society in mid-2019

Our Financial Crime team rolled out training in November 2018 available to all colleagues via a WebEx Masterclass during Financial Crime Awareness Week. The training covered Know Your Client (KYC), Behavioural and Transactional Indicators as relates to financial flows from human trafficking. It also included details of high-risk industries, such as agriculture, construction, healthcare, catering/hospitality and food processing, and provided real life case studies relating to labour and sexual exploitation



## Working with our suppliers

Updated in 2019, Our [Code of Supplier Responsibility](#) defines what we expect from our suppliers in order to ensure responsible sourcing is integral to the way we do business. It clearly distinguishes between what is expected from suppliers and what they are encouraged to do. We expect all suppliers to conform and provide us with evidence to demonstrate their approach to responsible business issues.

The [Code of Supplier Responsibility](#) addresses seven specific issues, including human rights and labour issues, and details the expectations we place on our suppliers and those in their supply chains. Our expectations are that suppliers:

- **Respect the human rights of their employees and comply with all relevant legislation, regulations and directives in the countries and communities where they operate**
- **Prohibit forced labour (slavery) and human trafficking in their supply chain and give their employees the right and ability to leave employment if they choose**
- **Prohibit child labour**

- **Allow their employees to exercise their legal right to organise and join associations (such as trade unions)**
- **Provide clear and uniformly applied disciplinary and grievance procedures including prohibiting mental, physical or verbal abuse**
- **Ensure working hours are in accordance with local regulation and industry practice and voluntary overtime is at a manageable level**
- **The wages they pay meet legally mandated minimums without unauthorised deductions**

Our suppliers are also asked to comply with specific Third Party Supplier Policies, where applicable to the services they provide to the Group. We include our standard modern slavery clauses in our supplier contracts and purchase orders' standard terms and conditions to ensure compliance with all laws that apply to their supply of goods and services to us, regardless of the jurisdiction in which they operate. This includes the Modern Slavery Act and any local legislation that is aimed at combatting modern slavery; we ensure that we receive appropriate information on suppliers' supply chains and organisations, including copies of their modern slavery statements, if applicable.


As part of our risk-based approach to supplier management, we analyse suppliers based on geography, service sectors and spend. The majority of our direct suppliers represent a traditionally low risk of modern slavery and human rights abuses. According to the 2018 Global Slavery Index, 99 per cent of our suppliers are in geographies that are considered low risk for modern slavery; 95 per cent of our direct suppliers are located in the UK, 3 per cent in other European countries, 1 per cent in North America and the remaining 1 per cent in other countries, including India, Israel and Hong Kong.

Additionally, over 80 per cent of our external supplier spend is in service sectors considered low risk such as management consultancy, legal, HR, IT, marketing and communication. Analysis of the remaining 20 per cent potential higher-risk service sectors shows that 99.6 per cent of this spend is through entities within the UK. Where we have suppliers in recognised higher risk service sectors such as cleaning, catering, property, security and uniform providers we ensure that a dedicated Supplier Manager supports these relationships. Whilst we recognise that we are not immune to the risks of human rights abuse, we consider the risks to be considerably less than if these suppliers were located in other jurisdictions or sectors.

## Outcomes

To raise employees' awareness of this priority area for our business, we developed and delivered training and guidance described in the outcomes on Page 5

Guidance on modern slavery risks which is available through our online supplier management portal

 [Code of Supplier Responsibility](#)



# ENVIRONMENT

## Principle 7

Businesses should support a precautionary approach to environmental challenges;

## Principle 8

Undertake initiatives to promote greater environmental responsibility; and

## Principle 9

Encourage the development and diffusion of environmentally friendly technologies.





## Our approach

**At Lloyds Banking Group, we have a unique position within the UK economy with our purpose of Helping Britain Prosper.**

We support the aims of the 2015 Paris Agreement on Climate Change and the UK Government's Clean Growth Strategy. We are committed to supporting the UK to successfully engage with opportunities and challenges created by climate change.

## To meet our commitment, we have developed an approach that will:

- Identify new opportunities to support our customers and clients and to finance the UK transition to a sustainable low carbon economy
- Identify and manage material sustainability and climate related risks across the Group, disclosing these and their impacts on the Group and its financial planning processes in line with the Task Force on Climate-related Financial Disclosure (TCFD) recommendations
- Use our scale and reach to help drive progress towards a sustainable and resilient UK economy, environment and society through our engagement with industry, Government, investors, suppliers and customers
- Embed sustainability into the way we do business and manage our own operations in a more sustainable way

Over the next three years, we are working towards our overall aim of becoming a leader in supporting the UK to successfully transition to a more sustainable, low carbon economy. To do this, we have set ourselves seven ambitions:

1. Be a leading UK commercial bank for sustainable growth, supporting our clients to transition to sustainable business models and operations and to pursue new clean growth opportunities
2. Be a leading UK provider of customer support on energy efficient, sustainable homes
3. Be a leading UK provider of low emission/ green vehicle fleets
4. Be a leading UK pension provider that offers our customers and colleagues sustainable investment choices and challenges companies we invest in to behave more sustainably and responsibly
5. Be a leading UK insurer in improving the resilience of customers' lives against extreme weather caused by climate change
6. Be a leading UK bank in the Green/ Sustainable Bonds market
7. Be a leading UK bank in reducing our own carbon footprint and challenging our suppliers to ensure our own consumption of resources, goods and services is sustainable



For each ambition we will consider the UK Government's targets and current plans. We will use forward looking scenarios to identify risks and opportunities over the short, medium and long term and assess how they impact the resilience of our strategy.

We have established a dedicated governance process to provide oversight and ownership of the sustainability strategy. This includes the Responsible Business Committee (RBC), a sub-committee of the Board, which meets quarterly and provides Board level oversight. At Executive level, we have established a Group Executive Sustainability Committee (GESC), which is a sub-committee of our Group Executive Committee (GEC) and provides oversight and recommends decisions to the GEC.

We have also created a Group sustainability team, supported by divisional Governance Forums and working groups led by divisional Managing Directors. This enables a coordinated approach to oversight, delivery and reporting of the Group sustainability strategy to the GESC, along with a mechanism for keeping management and the Board updated on climate related issues impacting the Group.

To support the implementation of the TCFD recommendations across the Group, we have established a senior executive group TCFD forum. In 2018, we commenced a review of climate-related risks and opportunities in the Group's Commercial Banking division. Detailed assessments are now being undertaken in 2019 on higher risk sectors in Commercial Banking and the scope of review is expanding to include other divisions.

As part of our TCFD implementation plan we are developing a long term reporting framework that will enable us to track our performance against our sustainability strategy and disclose the financial impact of climate change related risks and opportunities. This will build on the work we have already done to develop a set of market leading targets for improving the sustainability of our own operations, which include reducing our operational waste and improving energy, water, paper and building efficiency.

We are also supporting others in becoming more sustainable. In 2018 we launched a £2 billion Clean Growth Finance Initiative (CGFI) to help British businesses reduce their environmental impacts and benefit from the transition to a sustainable low carbon economy.

## Working with our suppliers

Our ambition is to be a leader in reducing our own environmental footprint and we work with our suppliers to ensure our own consumption of resources, goods and services is sustainable as well as reducing environmental impact in our supply chain. As a minimum, we expect suppliers to:

- **Have a written environmental policy or statement in place which is appropriate and relevant for their operations**
- **Abide by all rules and regulations related to the protection of the environment**

We also encourage suppliers to have an environmental management system in place.

## Outcomes

Business travel carbon emissions reduced by 14 per cent since 2016

Total energy consumption reduced by 6 per cent since 2016

100 per cent of UK electricity came from renewable sources in 2018

29 per cent reduction of location based greenhouse gases since 2016

2.6m homes that could be powered as a result of our support of UK renewable energy projects in 2018

1.4m sq ft of commercial real estate space funded to become more energy efficient with green loans in 2018



Position statements about sectors that feature heightened environmental risk are available online

[Lloyds Banking Group Reporting Centre](#)



More information about our sustainability strategy, targets and performance is available

[2018 Annual Report and Accounts](#)  
pages 24-25

[Responsible Business Data Sheet 2018](#)



# ANTI-CORRUPTION

## Principle 10

Businesses should work against corruption in all its forms, including extortion and bribery.





## ANTI-CORRUPTION

continued

### Our approach

**Lloyds Banking Group is at the heart of communities, serving the financial needs of over 26 million customers in the UK. We have a moral and ethical duty to act with the highest standard of integrity and will not tolerate acts of bribery or corruption committed by any of our employees, including the Board of Directors, and any third parties who act on our behalf. Lloyds Banking Group is a member of the Transparency International Business Integrity Forum.**

To tackle bribery and corruption, we have policies and procedures in place to comply with all applicable laws and regulation where we operate. This includes an Anti-Bribery Policy which prohibits the payment, offer, acceptance or request of any benefit which could be construed as a bribe and takes a broad approach to defining corruption as misconduct associated with the abuse of power for private gain. This is informed by guidance issued by the UK Ministry of Justice to support the UK Bribery Act 2010 which applies to us wherever we operate in the world.

All colleagues, including contractors, complete mandatory annual Anti-Bribery training annually and are encouraged to confidentially report any instances of suspected bribery via the whistleblowing service, Speak Up, or their line manager. Colleagues are also encouraged to speak out if they have any suspicions regarding violations of the standards in our Code of Responsibility and other policies and procedures.

Our approach and governance is overseen by the Financial Crime Standards Committee, and Financial Crime Prevention Committee, which meet monthly to discuss and resolve issues.

We have identified and developed clear position statements about sectors that feature heightened risk, which are publicly available [online](#). These include defence, forestry, mining, oil and gas and power and during 2018, we reviewed our external sector statements to ensure alignment to our sustainability strategy and to consider climate related risk. In all sectors, which may have heightened Ethical, Social & Environmental (ESE) risk, we aim to work with customers to:

- Implement effective market-based solutions that take into account any social and environmental concerns about their operations
- Operate safely and securely within a defined framework that upholds human rights
- Align their operations with the principles of this framework and with the United Nations Global Compact Framework's labour, environment and anti-corruption standards
- Assess the long-term impact of their activities across the entire supply chain and give specific consideration to impacts that affect indigenous people and local communities
- Show a clear commitment to robust ESE risk management, including Health & Safety, environmental and social impact, and evidence of a good track record for transparency in the way they manage these and other risks



# ANTI-CORRUPTION

continued

## As a minimum, we expect our suppliers to:

- Adopt a Code of Business Responsibility or similar that covers adherence to local laws, bribery and corruption and business integrity; including improper payments, conflicts of interest, fraud, competition, gifts and hospitality and brand and intellectual property protection

We measure our performance by monitoring the following:

- Number of incidents involving a colleague or supplier offering or accepting a bribe
- Number of breaches in our policy
- Number of completed training sessions
- Number of staff in financial crime roles
- Number of waivers submitted by business units in relation to our Group Policy

In relation to high risk sectors, businesses within the Group are expected to identify any higher risk sectors or jurisdictions and implement appropriate controls to address any bribery and corruption issues identified. This includes enhanced due diligence and also sign off from the business' own risk area as well as a requirement that the Nominated Senior Manager within the business would be required to approve the relationship prior to any contracts or formal agreements being signed.

## Outcomes

No fines or external legal cases involving the Group during 2018

Ensuring colleague awareness of modern slavery through our annual Anti Money Laundering mandatory training module. This contains information in relation to human trafficking and the 'red flags' that will assist colleagues in detecting and reporting activity. In 2018, around 97 per cent of colleagues completed this training

 Position statements about sectors that feature heightened anti-corruption risk are available online [Lloyds Banking Group Reporting Centre](#)

**We have a moral and ethical duty to act with the highest standard of integrity and will not tolerate acts of bribery or corruption committed by any of our employees, including the Board of Directors, and any third parties who act on our behalf.**



## TELL US WHAT YOU THINK

**Queries or comments can be shared at any time by writing to:**

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