

# Our Code of Conduct

*Doing the right things*





A photograph of three people in a modern office setting. Two women and one man are seated around a small, round wooden table. They are all smiling and looking at a laptop on the table. The woman on the left has long blonde hair and is wearing a dark green dress. The woman in the middle has long dark hair and is wearing a white blouse with a black floral pattern. The man on the right has curly brown hair, glasses, and is wearing a white button-down shirt and dark trousers. On the table, there is a laptop, a pen, and three black mugs with the Paragon logo. The background consists of blue acoustic panels and a white ceiling with recessed lighting. A green exit sign is visible in the upper left corner of the photo area.

**“To be a sustainable partner, it's not enough to concentrate simply on what we do. We are also accountable for how we go about it. This is why we must always focus on doing the right things.”**



# Contents

<b>Message from our CEO</b>	<b>1</b>
<b>Our culture, our purpose and our values</b>	<b>2</b>
<b>Our code: doing the right things</b>	<b>3</b>
<b>Speaking up</b>	<b>4</b>
<b>01 Our colleagues</b>	<b>5</b>
Professional conduct	6
Respect for all	7
Learning and development	8
Leadership excellence	8
A balanced approach to performance	9

<b>02 Our customers</b>	<b>10</b>
Doing the right thing for our customers	11
<b>03 How we do business</b>	<b>12</b>
Risk management	13
Preventing and detecting financial crime	14
Conflicts of interest	17
Data protection	18
Information security	19
Suppliers	20
Human rights	20
Looking after our environment	21
Communications with our regulators, the media and social media	22





At Paragon, we work as one team with a clear purpose to support the ambitions of the people and businesses of the UK by delivering specialist financial services.

Delivering on our purpose is fundamental to the success of our customers, our colleagues, the economy and the wider world around us.

To be a sustainable partner, it's not enough to concentrate simply on what we do - we are also accountable for how we go about it. This is why we must always focus on doing the right things.

Our fast-paced, interconnected world presents huge opportunities for innovation and progress but, as we forge ahead, we will inevitably face challenging situations where the right path is not always clear. This is when we must take a step back and think clearly about how we will respond.

This Code of Conduct is designed to help you navigate through the vast array of decisions that you will need to make to deliver effectively on our purpose.

While there are a wide range of legal and regulatory obligations that direct our behaviour, we must also live up to the Paragon values of professionalism, respect, fairness, integrity, commitment and teamwork, while working with creativity and good humour to make sound and decent choices.

From July 2023, the FCA introduce a new Consumer Duty, designed to raise the standard of consumer protection right across the financial services industry. It requires firms to put customers' needs first and to achieve good customer outcomes. At Paragon, we're using the Duty as an opportunity to build on the high customer standards we already hold throughout our business.

Our purpose and our values underpin our strong culture at Paragon. They provide a compass to guide us as we fulfil our commitment to deliver good outcomes for our customers and act as a strong support for all our stakeholders.

I'm incredibly inspired by how we work together and take responsibility for doing the right things reliably and consistently, challenging constructively to arrive at sound decisions. Individually and collectively, this the only way we can continue to strengthen our culture and make sure Paragon is always an organisation we feel proud to be part of.

# Message from our CEO

**Nigel Terrington**  
Chief Executive



# Our culture, our purpose and our values

Being a responsible and dependable partner is essential to our success. Our purpose and values underpin our strong culture and make sure that we focus on doing the right things.

We work together to achieve a common purpose – to support the ambitions of the people and businesses of the UK by delivering specialist financial services.

By living our purpose, we have developed and continue to evolve an exciting range of mortgage, commercial lending and savings products to support a unique group of customers with a distinctive set of needs.

We understand that our support underpins the success of our customers, as well as the strength of the wider economy.

Importantly, we also recognise that being effective in delivering on our purpose depends not just on the depth of our specialist expertise, but also upon the strength of our organisational culture – the way we go about things.

Our culture is built upon a commitment to do the right things for our customers, our colleagues, our wider stakeholders and the world around us.

Doing the right things means making clear and ethical decisions, understanding the implications of our actions, being accountable for them and making a commitment to speak up and put things right where we see something that is wrong.



### Fairness

To work together to ensure good outcomes for all our customers



### Professionalism

To maintain the highest standards and deliver our products and services with care and accuracy



### Integrity

To be honest and open in everything we do



### Humour

To ensure we have fun while achieving success!



### Commitment

To drive the business forward with determination and to do so with effort and enthusiasm



### Creativity

To identify and create new business opportunities and apply creative and effective solutions to problems



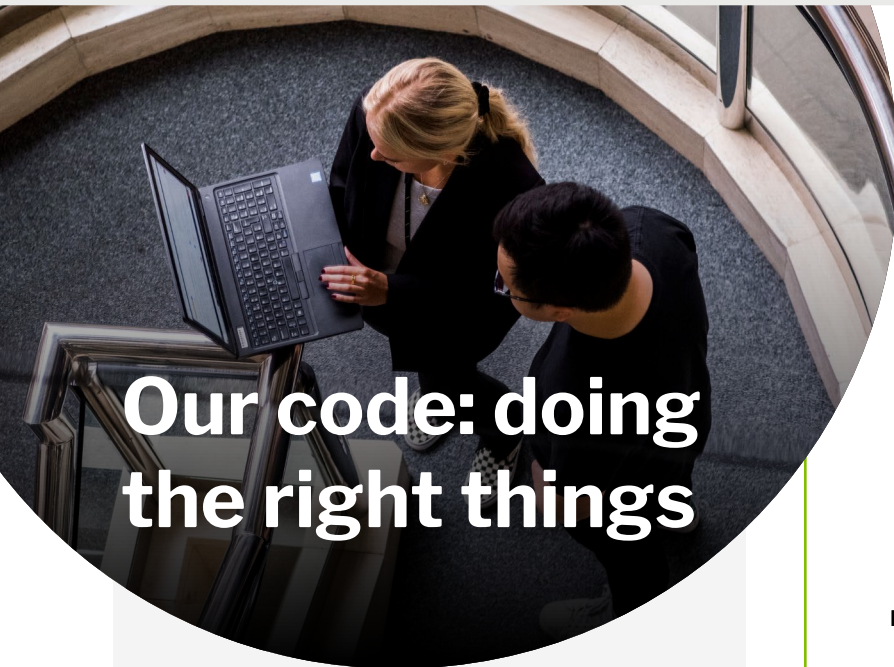
### Teamwork

To work in harmony and collectively towards the delivery of our overall objective



### Respect

To treat people as individuals and listen to their views



# Our code: doing the right things

## Manager responsibilities

All our managers are expected to take an active role in promoting the Code of Conduct and embed it within their own team and throughout the organisation.

As a manager, this means that you will:

- ✔ lead by setting a good example
- ✔ ensure your team are aware of the Code of Conduct, have read and understood it and completed the attestation
- ✔ encourage discussion and challenge colleagues to ensure we are always doing the right things
- ✔ be available to colleagues when they seek your opinion on difficult issues
- ✔ create an environment where colleagues know they can speak up without fear of retaliation if they have concerns

## Asking the right questions

There are many situations where we will be challenged to decide whether we're doing the right things. Our Code of Conduct can't provide specific guidance on every situation and when you feel unsure about the right course of action, it will help to ask yourself the seven questions set out below:

<p><b>1</b></p> <p>Are my actions legal?</p>	<p><b>2</b></p> <p>Do my actions comply with the banking regulations?</p>	<p><b>3</b></p> <p>Am I following Paragon's policies and procedures?</p>
<p><b>4</b></p> <p>Am I acting in accordance with Paragon's purpose and upholding its values?</p>	<p><b>5</b></p> <p>Have I consulted with the right people?</p>	<p><b>6</b></p> <p>Would I feel comfortable if I was challenged?</p>
<p><b>7</b></p> <p>Will my actions help to build Paragon's reputation as a bank that people can trust?</p>	<p>If you're doing the right things, you should be able to answer 'yes' to all of these questions.</p>	

## Working together



This Code applies to **everyone** who works at Paragon, including all Directors, employees and contractors.

We must all read the Code of Conduct when we join Paragon and then update ourselves at least annually. Every year, we will be asked to complete an attestation to confirm that we understand the Code of Conduct and agree to comply with it.

When we fail to follow the Code of Conduct, we are putting Paragon's reputation at risk. We understand that following the Code of Conduct helps to reinforce our strong culture at Paragon and we know that we could face disciplinary action and potentially even dismissal if we act outside of the Code of Conduct.



## Speaking up

If you are concerned that something you see does not follow the Code of Conduct, it's your responsibility to speak up.

1

### Talk to your line manager

In most cases, we hope you will feel able to raise any concern with your manager, but if not, under our whistleblowing policy, you have alternative options – all safer than silence

2

### Contact Paragon's Whistleblowing Group

4

### Regulatory contacts

Financial Conduct Authority  
[www.fca.org.uk/firms/whistleblowing](http://www.fca.org.uk/firms/whistleblowing)

Prudential Regulation Authority  
[www.bankofengland.co.uk/whistleblowing](http://www.bankofengland.co.uk/whistleblowing)

3

### Make an independent disclosure

Make a disclosure in complete confidence to the independent charity advice line, **Protect**

Call **0203 117 2520**

Open Monday to Friday 9am to 6pm.  
Outside of these hours please leave a message or email  
[whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)

Paragon will support you and it's vital that we all feel able to speak out freely without fear of negative consequences.

# 01

## Our colleagues

We want Paragon to be an organisation that people are proud to be a part of. We rely on each other to do the right things every day and even in the most difficult circumstances. We welcome people who share our purpose and our values and we each take responsibility for building and protecting our strong culture.





## Professional conduct

High standards of conduct are essential to our success as an organisation. They are the basis upon which our stakeholders engage with us and the foundation for our strong culture.

Success is defined not simply by what we achieve, but also by how we go about it. This means that no matter how stretching or ambitious our individual or organisational targets might be, we commit to behaving professionally and ethically.

We do not tolerate any behaviour that contravenes the law, relevant regulations or Paragon's policies and procedures. We commit to delivering on our purpose and living up to our values and to speaking up when we are concerned that our standards may be compromised.

### What this means for me

- ✓ **I will comply with the law and follow industry regulations**
- ✓ **I will adhere to Paragon's policies and procedures**
- ✓ **I will take part in learning and development that enhances my understanding of conduct issues**
- ✓ **I will ensure my conduct is in line with our purpose and values**
- ✓ **I will speak up if our high standards of conduct could be at risk**

**We are each responsible for the standards that we tolerate. Make time to understand the high standards of conduct that we expect at Paragon and in our industry and feel confident to challenge where things don't seem right.**



*Nigel Terrington, Chief Executive*



If you are in financial difficulty, it's important to speak up and seek help. When we're under financial strain, there's a higher risk that we will compromise our standards.

If your financial situation is making you anxious, please approach your manager, Human Resources or a member of Paragon's Wellbeing Team. They will help to make sure that you're getting all the support available to get you back on track as quickly as possible. Information that you share about your financial situation will be treated confidentially.

#### WELLBEING TEAM

Financial Wellbeing Resources

#### RELATED POLICIES

Conduct Risk Policy

Reputational Risk Policy

**As a regulated firm, you are also subject to the FCA conduct rules below:**

- 1** You must act with integrity.

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- 2** You must act with due skill, care and diligence.

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- 3** You must be open and co-operative with the FCA, PRA and other regulators.

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- 4** You must pay due regard to the interests of customers and treat them fairly.

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- 5** You must observe proper standards of market conduct.

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- 6** You must act to deliver good outcomes for retail customers.



## Respect for all

We are committed to creating a working environment in which employees feel valued and respected and can contribute to the success of the business.



Equality, diversity and inclusion are important to us. We believe the diversity of our team should reflect the diversity in the world around us and that by collaborating effectively and sharing our talents, we will broaden our perspective and serve our customers more effectively.

We will not tolerate any acts of unlawful or unfair discrimination, harassment or bullying because of sex, sexual orientation or gender reassignment, marriage or civil partnership, pregnancy and maternity, race, disability, religion, belief or age.

### What this means for me

- ✓ I will treat everyone with dignity and respect
- ✓ I will encourage and support all of my colleagues equally
- ✓ I will listen to different points of view and factor them into my decision making
- ✓ I will participate fully in learning and development to broaden my perspective
- ✓ I will support equality, diversity and inclusion at Paragon

**Organisations that are more diverse and more inclusive are more successful. They are better places for people to work and they foster a greater sense of engagement and belonging.**



*Richard Rowntree, Managing Director of Mortgages and Executive Sponsor of Paragon's Equality, Diversity and Inclusion Network*



**A member of my team has returned from parental leave and asked about flexible working to help with childcare arrangements. What can I do to support them?**

We promote hybrid working and flexibility around how and where we work to help employees achieve a healthier work-life balance. You can consider a range of different options such as condensed or part-time hours, job-sharing or working from home depending on the role and business needs.



#### RELATED POLICIES

**Equality, Diversity and Inclusion Policy**



## Learning and development

We are passionate about developing our people and provide a wide range of opportunities for learning so that we can each expand our expertise and reach our full potential.

Learning and development helps everyone to build competence in their current role, develop confidence to take on new challenges and keep connected to key developments in our industry and society.

From on-the-job training, e-learning and support for professional qualifications through to mentoring and structured development programmes for our aspiring and senior leaders, we work together to bring out the best in each other.



### RELATED POLICIES

Training and Competence Policy

### What this means for me

- ✓ I will complete all mandatory learning assigned to me
- ✓ I will prioritise time for learning on a regular basis and record my progress
- ✓ I will review my development needs with my manager at least annually and take action to improve my performance and expand my expertise and contribution



## Leadership excellence

We expect our leaders to create an environment that drives high performance and set an example and expectation of professional and ethical conduct in all situations.

Our **leadership commitment** shows managers what we expect of them to be successful, both in terms of leadership behaviours and how they support their people to be their best at work.

Leaders are expected to use the leadership commitment to assess their strengths and identify where they need to develop.

### What this means for me as a manager

- ✓ I will read and understand the leadership commitment
- ✓ I will set performance objectives in line with the leadership commitment
- ✓ I understand the leadership behaviours, responsibilities and level of skill I need to operate effectively
- ✓ I will identify areas where I need to develop and take action to do this

## A balanced approach to performance

During 2023 and 2024, we will introduce a more balanced approach to objective setting, ensuring that we each adopt objectives in five areas that are fundamental to business success. These are:

### THINK CUSTOMER

We understand the requirements of our customers and we support them with products and service that will meet their objectives and deliver good outcomes for them.

### THINK RISK

We follow the enterprise risk management framework, identifying and focusing our attention on the risks that are likely to have the most significant impact on the achievement of our business objectives.

### THINK PEOPLE

We work together to make sure our colleagues feel valued and respected and have the support they need to contribute fully to business success.

### THINK SUSTAINABILITY

We understand our responsibilities towards the environment and the societies in which we live and work. We are focused on doing the right things for all our stakeholders and contributing to a world in which we can all thrive.

### THINK COMMERCIAL

We use commercial thinking to understand the bigger picture, identifying potential challenges and opportunities and turning them into creative and compelling visions for action.





# 02

## Our customers

Customers are at the heart of our business and, as a specialist bank, we use our expertise to provide financial products and support to help them achieve their ambitions.

We are committed to delivering good outcomes for our customers, offering extra support when they need it and listening to their feedback.





## Doing the right thing for our customers

We focus on delivering good outcomes for all our customers.

It is important to us that our customers have confidence in Paragon and trust that we will consider their needs, act fairly and responsibly towards them and take action to prevent them from foreseeable harm.



**A customer has contacted me to discuss payment difficulties. They are very upset. What should I do?**

**T**reat every customer as an individual. Thank them for getting in touch and acknowledge how they feel. Encourage them to tell you more about their situation and what specifically is making them upset so that you can tailor your support.

You should signpost the customer to a third party organisation that can provide independent help and advice with their issues.

Based on what you've heard, think about what's fair for this customer right now. For example, it might be best to agree a bit of breathing space or a different payment arrangement.

If you don't have the mandate to offer the solution you think is best, seek authority from your manager and then call the customer back to agree what the next steps will be. If you have any further questions or need support, refer to the **Customer Support pages** on The Hub or **contact a member of the Customers in Vulnerable Circumstances Working Group.**

### What this means for me

#### I understand that:

- **products and services must be designed to meet customer needs, characteristics and objectives**
- **products and services should represent fair value to customers**
- **we must provide the right information at the right time which is clear and concise so that customers can make effective, timely and informed decisions**
- **we must treat customers the way we say we will throughout our relationship**
- **we should not put unreasonable post-sale barriers in place to stop customers changing their product, switching provider or submitting a claim or complaint**

#### I will:

- ✓ **complete all training assigned to me to help me improve the support I offer to our customers**
- ✓ **support customers in vulnerable circumstances, including those in vulnerable circumstances, and tailor Paragon's approach to their individual needs**
- ✓ **record and act on customer feedback and complaints in line with Paragon's policies and procedures**



# How we do business

Alongside our conduct in relation to colleagues and customers, doing the right things also has some important implications for the way we do business and our relationship with other stakeholders. It is essential that we understand this and act accordingly.





### Risk Champions

Get to know the Risk Champion for your area. They're here to help raise awareness of risk issues and can help you think through anything risk-related.

## Risk management

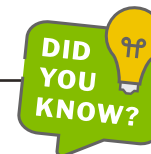
Effective risk management is central to our success and we have an enterprise risk management framework in place to make sure we can identify and focus attention on the risks that are likely to have the most significant impact on the achievement of our objectives.

The risk management framework and the governance arrangements associated with it are aligned with our organisational structure and set out distinct, transparent and consistent lines of responsibility.

Building and maintaining a strong risk culture is a fundamental element of our overall corporate culture and we rely on everyone to play their part.

### What this means for me

- ✓ I will familiarise myself with Paragon's enterprise risk management framework
- ✓ I understand that I am accountable for the risks that I take
- ✓ I will follow Paragon's policies and procedures to minimise risk
- ✓ I will highlight risk events and potential risks to my line manager and Risk Champion so they can be appropriately recorded, monitored and controlled



### Our framework

Our risk management framework is built on three lines of defence.

- 1 The first line of defence is made up of **Directors, managers and employees involved in our operational and support areas** who have responsibility for identifying, assessing, treating, monitoring and reporting risks in our operations, and escalating and reporting risk issues to help make sure we are operating within our stated risk appetite or tolerance.
- 2 The second line of defence comprise our **risk specialists** who oversee the risk management framework and its implementation and development. This includes conducting assurance reviews.
- 3 The third line of defence is our **Internal Audit team**. They review our framework for completeness and test whether our risk controls are sufficiently comprehensive and operating effectively.

### RELATED DOCUMENTS

Enterprise Risk Management Framework



## Preventing and detecting financial crime

The UK has a wide-ranging legal and regulatory framework to prevent financial crime. Preventing and detecting financial crime is critical to protecting and enhancing the integrity of the UK financial system and it is essential that all banks and financial institutions take this responsibility seriously.

Financial crime includes fraud, theft, money laundering and terrorist financing. It also includes bribery and corruption and, here at Paragon, we have policies, procedures and robust controls in place to mitigate against the risk of financial crime. These are designed to protect our customers and employees.

Paragon has a responsibility to ensure that its employees are not involved in money laundering, fraud and/or terrorism and will therefore conduct periodic financial crime checks on employees.



### What this means for me

- ✓ **I will make sure that I understand financial crime risks relevant to my role**
- ✓ **I will complete all learning assigned to me on the topic of financial crime**
- ✓ **I will follow Paragon's policies and procedures to prevent and detect financial crime**
- ✓ **If I suspect financial crime may be taking place – either by our customers, employees or third parties – I will report my suspicions so that they can be investigated appropriately**

## How to identify and report financial crime

Financial crime can seem quite abstract so it's important to know what it includes, what to look out for and how to report any suspicious activity.



### Important!

When reporting suspected financial crime, you should raise your concerns via the appropriate channels and not discuss these with anyone else.

Please use the **Financial Crime Guidance Manual** on The Hub which provides up-to-date information on our approach and processes in relation to all financial crime matters.



### Theft and fraud

Amongst other things, theft and fraud can include:

- the theft of data belonging to Paragon or our customers
- manipulating management information to influence bonuses or commissions
- turning a blind eye to fraudulent loan applications
- falsifying information

If you **suspect a colleague is engaged in theft or fraud**, report your suspicions to either a senior manager, the Head of Financial Crime or the Whistleblowing line on 0203 117 2520.

If it involves an **external third party or customer**, report it to Paragon's Financial Crime team via the referral form on The Hub **Financial Crime Operations Referral Form**.

If you **suspect money laundering or terrorist financing**, you are personally responsible for making a Suspicious Activity Report to Paragon's Financial Crime team using the **Financial Crime Operations Referral Form** on The Hub.



### Money laundering and terrorist financing

Money laundering is the process of converting funds generated by crime into what appear to be legitimate funds by hiding or disguising the true origin and ownership of the money. It can take many forms, including:

- handling the proceeds of crime from theft, fraud and tax evasion
- handling stolen goods
- turning criminal money into 'clean' money
- investing the proceeds of crime into legitimate financial products

Terrorist financing is the illegal channelling of money to terrorist organisations. It can look similar to money laundering but may involve only small amounts of money. In addition, the original funds can be obtained through legitimate means.





## Bribery and corruption

Bribery includes:

- receiving or giving a bribe to gain a business advantage
- requesting or receiving a bribe to improperly perform a function
- suggesting a financial gain to provide favours that contravene normal policies and procedures

Corruption can often involve bribery and is classed as dishonest or fraudulent conduct.



## Gifts and corporate hospitality

We know that gifts and hospitality can be used as a bribe to gain business advantage.

If you are **offered a gift/hospitality** by an external party:

- 1 record it in the Gifts & Hospitality Register for your area whether you accept it or not
- 2 decline it politely if it comes from a third party involved in contract negotiations or a tender process to provide goods or services to Paragon
- 3 decline it politely and report it immediately to your line manager and Head of Business if you suspect it is an inducement of any kind
- 4 consult the Gifts and Hospitality Guide before accepting any gift worth more than £50 to find out what approval is required



Paragon does not make political donations or facilitation payments to government officials to get things done. All charitable donations from any part of Paragon must have appropriate sign-off.

### RELATED POLICIES

**Financial Crime Risk Policy**

**Anti-Bribery and Corruption Risk Policy**

Additional Financial Crime policies and guidance can be found in the **ERMF Document Library**

If you want to **give a gift/hospitality** to an external party:

- 1 confirm whether you are in negotiations with the external party
- 2 decide whether the gift/hospitality is appropriate and not excessive
- 3 ensure it cannot be interpreted as a bribe or inducement
- 4 obtain approval to offer the gift/hospitality from your line manager and Head of Business
- 5 if you go ahead, record it in the Gifts & Hospitality Register for your area



## Conflicts of interest

A conflict of interest exists when our judgement or actions at work are – or could be – affected by something unconnected with our role. This might include, for example, a personal or financial connection with a supplier, another job outside of Paragon or a relationship with someone we’re interviewing for a job.

In these situations, there is a risk that we put our own interests ahead of our customers or other stakeholders.

We should always avoid conflicts of interest where possible. If it’s not possible to avoid a conflict of interest then we must disclose it so it can be properly recorded and managed.



**Q My wife works for a company that provides IT services to Paragon. Is this a conflict of interest?**

**A** Having a close relationship with someone who works at a supplier is a potential conflict of interest and you should disclose it. By disclosing the conflict, we can make sure it’s properly recorded and put in place management controls to avoid any potential difficulties. For example, we can make sure you don’t work directly with this supplier and that you’re never a decision-maker in a tender involving the company.

**RELATED POLICIES**

**Conflicts of Interest Policy**

### What this means for me

- I will follow Paragon’s Conflict of Interest Policy**
- I will identify and disclose all conflicts of interest to my line manager, Head of Business, the People Director or the Chief Risk Officer**





## Data protection

We must look after confidential information relating to Paragon and personal data that belongs to our customers, employees and other stakeholders with the utmost of care. This type of personal information does not belong to us and we can only use and share it in very specific and carefully controlled circumstances.

It is essential that we follow legal and regulatory standards, as well as Paragon’s policies and procedures, when we collect, process and store confidential information and personal data.

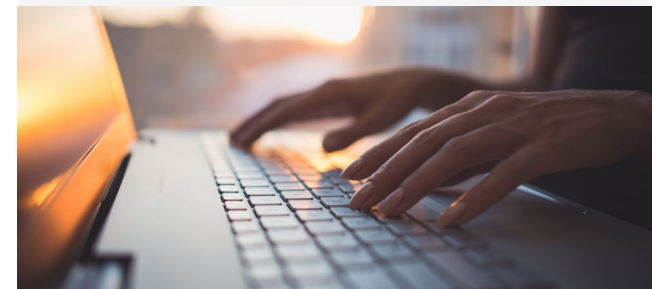
### What this means for me

- ✓ **I understand that I have a duty of confidentiality to Paragon**
- ✓ **I will follow all legal requirements, as well as Paragon’s policies and procedures, when handling confidential information and personal data**
- ✓ **I will not access or share confidential information or personal data without a legitimate business reason and appropriate authorisation**
- ✓ **I will report any breach of confidentiality or data protection immediately**



**I’m going to a new job soon. Once I’ve left Paragon, can I share information about Paragon’s customers with my new employer?**

No, you continue to have a legal obligation to protect this information even after you’ve left the company. If you share confidential and personal information like this, you will be exposing yourself, Paragon and your new employer to legal sanction.



**I’ve sent some personal data to an external party by mistake. What should I do?**

Although you haven’t done this maliciously, it’s still problematic and you need to let your line manager and Paragon’s Data Protection Officer know immediately so that the incident can be investigated and appropriate action taken promptly.

## Information security

High standards of information security help us protect confidential information and personal data, and they also underpin the smooth-running of all our operations. We have a comprehensive suite of Information Security Policies in place - some apply to everyone at Paragon and some apply specifically to the specialists working in our IT function.

Protecting information security puts some important obligations on each of us relating to the physical security of our offices, the care of company equipment and devices and email communications.



### What this means for me

**I will read and understand all the Information Security policies that are relevant to me and use information, systems and equipment responsibly and professionally in line with these policies.**

#### Physical security

- ✓ I will display my site security pass clearly
- ✓ I will report lost and stolen passes immediately
- ✓ I will not share or give my security pass to another person at any time
- ✓ I will not let anyone through an access-controlled door without a security pass on display
- ✓ I will not attempt to access data centres, comms rooms or restricted areas unless authorised
- ✓ I will inform reception of visitors and contractors expected to arrive on site and make sure visitors are escorted at all times
- ✓ I will protect company devices from theft, loss and damage
- ✓ I will report lost or stolen devices to the Service Desk immediately
- ✓ I understand that equipment for employees should not be used by family or friends

#### Email communications

#### Company equipment and devices

- ✓ I will not open any emails that look out of the ordinary or suspicious
- ✓ I will not click on a link in an email I don't recognise or am not expecting
- ✓ I will not enter my Paragon username or password information into links from a third party
- ✓ I will report any emails that look unusual or suspicious using the phishing button in Outlook or by contacting the Service Desk
- ✓ I will make sure that when my PC, laptop and devices are unattended, the screens are locked or I have logged off
- ✓ I will apply system updates and security patches at the earliest opportunity and make sure all devices have appropriate security features enabled



## Suppliers

We rely on a wide range of different suppliers to deliver on our purpose and working with suppliers effectively and collaborating well is critical to our continued success.

For our suppliers this means that, as a baseline, you will:

- work in line with all relevant regulations, legislation and guidelines that apply to you and your activities
- consider the impacts of your products, operations and working practices on the environment and Paragon, and have measures in place to manage these
- operate ethically, maintain high standards of corporate conduct, respect the welfare and wellbeing of your employees and the communities in which you operate

For our Directors, employees and contractors who are involved in selecting and managing supplier relationships, this means you will:

- engage with Paragon’s Procurement and Third Party Assurance team to make sure you follow the appropriate policies, procedures and standards when carrying out supplier selection, engagement, management and review



**FIND OUT MORE**

**Supplier Code of Conduct**

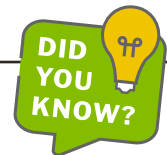


## Human rights

We respect all human rights and, in conducting our business, we regard those rights relating to non-discrimination, fair treatment and respect for privacy to be the most relevant and to have the greatest potential impact on our key stakeholder groups of customers, employees and suppliers.

We operate exclusively in the UK and, as such, we are subject to the European Convention on Human Rights and the UK Human Rights Act 1998.

We take steps to anticipate, prevent and mitigate any potential negative human rights impacts as well as enhance positive impacts through our policies and procedures and, in particular, through our policies regarding employment, equality and diversity, treating customers fairly, and information security.



### Our commitment

- ✓ We are committed to making sure there is no modern slavery or human trafficking in any part of our business or supply chains
- ✓ We comply with the working time directive which legislates an upper limit of an average of 48 working hours per week over a minimum 17 week period, unless employees officially opt out
- ✓ We are an accredited employer with the Living Wage Foundation which sets a minimum hourly rate according to the cost of living in the UK and is a higher rate than the Government’s National Living wage



**Going electric**

We are transitioning our company car fleet from diesel to plug-in electric hybrid and all electric vehicles.



## Looking after our environment

We always strive to work in a sustainable way. This means acting responsibly towards the environment and minimising the impact that we have on it.

We comply with environment laws and report our environment performance in a transparent and understandable way through our Annual Report and our Responsible Business Report.

Beyond this, we work to reduce the environmental impacts of our business activities and to become more efficient in our use of resources, whether directly or in our supply chain.

### How can I help?

**We will achieve our overall environmental goals by actively contributing to energy and resource efficiency in all our operations and activities. Here's some simple steps you can take to help:**

- 1  reduce paper use by only printing when essential to do so
- 2  don't use more office supplies than you need
- 3  put all waste in the correct recycling bins so recyclable waste doesn't go to landfill
- 4  turn off lights when you leave a room
- 5  use the power saving settings on your computer and devices
- 6  make sure your work area is not over or under heated
- 7  don't leave taps dripping and report problems quickly





### Regulators

Banks operating in the UK are regulated by the Prudential Regulation Authority (PRA) and the Financial Conduct Authority (FCA). The PRA is responsible for the financial safety and soundness of banks and the FCA is responsible for how banks treat their clients and behave in financial markets.

We are committed to being open and co-operative when communicating with our regulators.

### Media

We have a specialist media team who co-ordinate all of our communications with journalists and media outlets to make sure that we deliver accurate, up-to-date and properly contextualised information.

If you are approached by the media at any time – whether for a comment, an interview or an answer to a question, please direct the enquiry to our media team.

Always let the journalist know that you've done this and give them the contact details for the media team as well: [media.relations@paragonbank.co.uk](mailto:media.relations@paragonbank.co.uk)

### Social media

Social media can be a great way to interact socially and professionally, but be conscious of how your posts and comments, as well as your actions in public life - both online and in your everyday life - can impact on Paragon and on your employment.

## Communications with our regulators, the media and social media

To make sure Paragon is an organisation that we're all proud of, it's important that we communicate respectfully and appropriately with each other and with our wider stakeholders.

### How to engage on social media

#### Always follow this guidance when using social media:

##### Engage in a positive way

Conduct yourself on social media in an appropriate way that is in line with Paragon's values and HR policies

##### Use common sense

Social media is a public platform and what you say and how you behave can impact you, Paragon and working relationships

##### Interact with Paragon's official channels

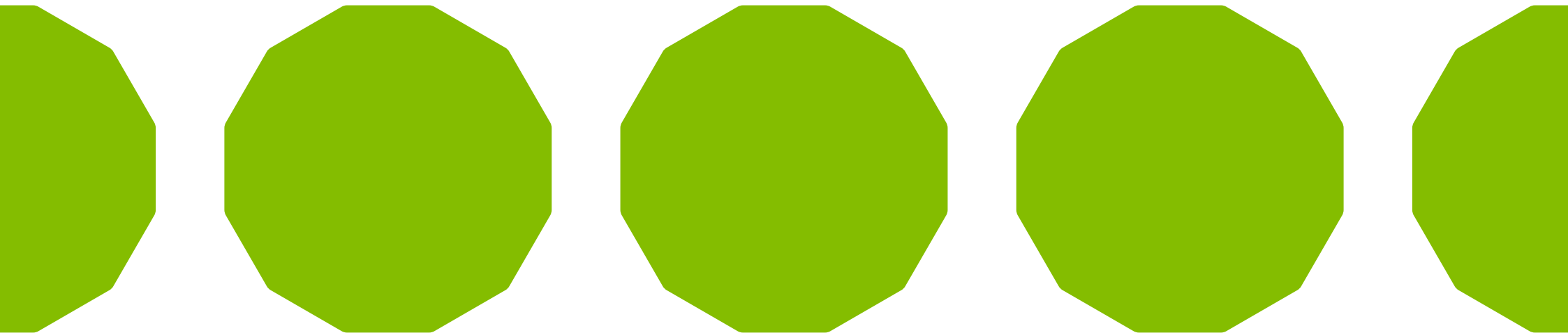
You can play a valuable part in helping to amplify the content we share by engaging with and resharing posts from our Paragon profiles

##### Don't overshare

Never disclose confidential or personal information

##### Watch out for financial promotions

If a social media post is a financial promotion or could become a financial promotion due to an employee comment, further advertising standards or regulatory rules apply



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