

Updated July 2023

Our Trust Code

All colleagues in the Society are required to observe the regulators' Code of Conduct (embodied in the Conduct Rules) and the wider requirements of the Senior Managers' Regime and Certified Regime (SM&CR).

SM&CR is all about culture; and the Conduct Rules help shape our standards and policies and promote positive behaviours. At YBS we call this **Our Trust Code**.

The Conduct Rules

The Conduct rules apply to everyone working for the Society, including both permanent colleagues and colleagues on fixed term contracts. They also apply to contractors whom we engage either directly or via an agency. Employees within the Agency Network are required to follow the Conduct Rules as well.

The rules set out what's expected of people who work in financial services. As an organisation built on trust, these rules simply reinforce what's already expected of us and should be embedded in colleague's day-to-day activities.

There are two tiers of Conduct Rules:

Individual Conduct Rules

- You must act with integrity.
- You must act with due skill, care and diligence.
- You must be open and co-operative with the FCA, the PRA and other regulators.
- You must pay due regard to the interests of customers and treat them fairly.
- You must observe proper standards of market conduct.
- You must act to deliver good outcomes for retail customers.

Senior Manager Conduct Rules

Colleagues in our Senior Managers' Regime have some additional conduct rules to follow.

- You must take reasonable steps to ensure that the business of the firm for which you are responsible is controlled effectively.
- You must take reasonable steps to ensure that the business of the firm for which you are responsible complies with relevant requirements and standards of the regulatory system.
- You must take reasonable steps to ensure that any delegation of your responsibilities is to an appropriate person and that you oversee the discharge of the delegated responsibility effectively.
- You must disclose appropriately any information of which the FCA or PRA would reasonably expect notice.

Compliance

All employees, both permanent colleagues and colleagues on fixed term contracts, are required to complete mandatory annual eLearning to ensure and provide confirmation that they have read and understand the conduct rules and associated processes.

While we all take care to comply with the Conduct Rules at all times, there may be instances where an individual's behaviour falls short of the expected standards. If this happens, the Society will investigate whether one or more Conduct Rules have been breached.

All suspected breaches are considered under the Society's Disciplinary Policy and are reported in accordance with the Regulatory Compliance Breach Incident procedure. This document is available to all colleagues on the Society's Intranet.

Breaches of the Conduct Rules, and any action taken as a result, may be required to be reported to our regulators within prescribed timescales and may be reported on future employment reference requests, inclusive of regulatory reference requests, for up to six years.

Where appropriate, the Society's Compliance and Internal Audit teams will review the internal adherence with regards to regulatory expectations and conduct risk management.