The Barclays Way
How we do business
Contents

Message from Nigel Higgins, Chairman 3

Message from Jes Staley, Group Chief Executive 4

The Barclays Way... What this means for you 5

The Barclays Way at a glance... a summary of our Purpose, Values and Mindset 8

The Barclays Way... How we behave 10
  Our role in society 12
  Customer/Client – delivering excellent service 13
  Colleague – promoting respect, diversity and performance in the workplace 14
    – colleague conduct 15
    – matters requiring disclosure 15
  Managing risk – maintaining strong governance, robust controls and high ethical standards 16

The Barclays Way... Speaking up and raising concerns 18

Supporting the Barclays Way... where to find policies and guidance 20

The Barclays Way... Questions and answers 22
The Barclays Way...

In my foreword to The Barclays Way last year I said that our company sits “at the intersection of some of the most urgent challenges facing societies today”. When I wrote those words, I did not imagine the scale of the role our institution would have in helping our colleagues, our customers and clients, and the communities in which we live and work, to navigate the huge challenges arising from the COVID-19 Pandemic.

Seeing the actions of colleagues through this extraordinary period, it is clear to me that the principles of the Barclays Way – our code of conduct, which sets the standards of behaviour we should all aspire to in our professional lives – truly resonate across our organisation. You have demonstrated the best of Barclays, and I thank you for your commitment.

In challenging times it is more important than ever that we conduct ourselves in as exemplary a fashion as possible. We won’t get everything right, at least not first time, but I know that we are confronting unprecedented challenges and facilitating previously unimaginable levels of Government support through new schemes. Our stakeholders rightly expect that we will do all we can to support society and the economy, and you should all be proud of the way that you and the organisation have risen to the challenge.

In that respect, I hope you agree that the Barclays Way is a big help here, its standards and its spirit helping make the right decisions every day. We will need to learn from this challenging time – it may not be the last crisis and we would love your feedback on what we can do better for the next. Most of you have been working from home. That has gone really well but I’m sure it has drawbacks, perhaps in productivity, certainly in the loss of “time together”. We all need to think together about this and we would welcome everyone’s thoughts.

In the meantime, thank you for your continuing support.
The Barclays Way...

The Barclays Way – our code of conduct – is a source of support for all of us in our day-to-day activities, and in all aspects of our working lives. That is the case whether we’re interacting with other Barclays colleagues, with our customers and clients, with governments and regulators, business partners, suppliers, competitors, or the societies and communities in which we live and work.

It is based on our Values of Respect, Integrity, Service, Excellence, and Stewardship and our Mindset – Empower, Challenge and Drive – and helps us to think about how to apply the right behaviours in everything that we do. It ensures that we sustain a strong ethical and inclusive culture at Barclays, in which it is easy for us to make the right decisions in any given situation. This is essential always, but even more so during challenging times such as we have experienced over the last few months.

While this document is comprehensive, of course it can’t cover every scenario that we might face at work. So we also always need to try and exercise our own good judgement – using the principles, standards, and policies set out in The Barclays Way as a guide.

Thank you for your commitment to Barclays during these extraordinary times.

Jes Staley
Group Chief Executive Officer
The Barclays Way...
What this means for you
Our Purpose

Our Purpose is the reason our company exists; the societal need we fulfil. Our Purpose is:

Finance is the oxygen of the economy. Acting transparently and with expertise, we deploy finance responsibly to support people and businesses. We have the capability and capital, the operational resilience and the commitment, to make a real and lasting difference to the economic lives of customers and communities. This is as true today as it was when our bank was founded over 330 years ago.

Acting with empathy and integrity, we aim to be a leader in the profession of banking and to engender trust amongst our key stakeholders. We understand the power of building a supportive and inclusive culture for everybody, knowing that we make a bigger difference when we pull together as one team.

We operate with energy and imagination, championing innovation and sustainability, to make a positive and enduring difference, to take pride in leaving things better than we found them. New ideas and technologies can help customers and communities to unlock opportunities.

Our success is judged not only by commercial performance, but also by our contribution to society, and how we act responsibly for the common good and the long term, because these outcomes are mutually dependent. We are at our best when our clients, customers, communities, and colleagues all progress.

This code of conduct outlines the Purpose, Values and Mindset which govern our way of working across our business globally.
What this means for you

This code of conduct outlines the Purpose, Values and Mindset that govern our way of working across our business globally. It constitutes a reference point covering all aspects of colleagues’ working relationships, and provides guidance on working with colleagues, customers and clients, governments and regulators, business partners, suppliers, competitors and the broader community.

The behavioural standard set by the Barclays Way applies to every Barclays colleague, in every country, and to colleagues in the subsidiaries in which we have a controlling interest. Other subsidiaries in which Barclays has a minority interest, and joint ventures in which we participate, are encouraged proactively to adopt an equivalent approach, as are any other entities or individuals contracted by Barclays to do work on the bank’s behalf.

The objective is to define the way we think, work and act at Barclays to ensure we deliver against our Purpose.

- Barclays takes the Values, Mindset and associated behaviours, and points set out in the Barclays Way, very seriously
- It’s every colleague’s responsibility to be aware of and understand this code of conduct and the policies which apply to our roles
- Colleagues who are unsure of what course of action to take should check local policy, or with their line manager, or a senior manager. It is expected that, when unsure of a matter, colleagues will err on the side of caution
- Colleagues are required to undertake annual training, which includes an assessment to confirm understanding of the Barclays Way
- Any failure to act in accordance with the Values, Mindset and associated behaviours or breaches of this code of conduct may result in disciplinary action, up to and including dismissal
- All colleagues’ performance is measured against ‘what’ they deliver (their objectives) and ‘how’ they achieve this (their demonstration of our Values and Mindset).
The Barclays Way...
At a glance
Finance is the oxygen of the economy. Acting transparently and with expertise, we deploy finance responsibly to support people and businesses. We have the capability and capital, the operational resilience and the commitment, to make a real and lasting difference to the economic lives of customers and communities. This is as true today as it was when our bank was founded over 330 years ago.

Acting with empathy and integrity, we aim to be a leader in the profession of banking and to engender trust amongst our key stakeholders. We understand the power of building a supportive and inclusive culture for everybody, knowing that we make a bigger difference when we pull together as one team.

Purpose
The reason Barclays exists; the societal need we fulfil
We deploy finance responsibly to support people and businesses, acting with empathy and integrity, championing innovation and sustainability, for the common good and the long term.

We operate with energy and imagination, championing innovation and sustainability, to make a positive and enduring difference, to take pride in leaving things better than we found them. New ideas and technologies can help customers and communities to unlock opportunities. Our success is judged not only by commercial performance, but also by our contribution to society, and how we act responsibly for the common good and the long term, because these outcomes are mutually dependent. We are at our best when our clients, customers, communities, and colleagues all progress.

Empower
Trust and support each other to deliver. Make decisions with those closest to the topic. Include diverse perspectives. Celebrate success and learn from failure.

Challenge
Question whether things can be done better. Use insights based on data to inform decisions. Be curious about how we can adapt and improve. Speak up and be open to alternative viewpoints.

Drive
Focus on outcomes. Deliver with pace. Be passionate and ambitious about what we do. Take personal responsibility. Actively build collaborative relationships to get things done.

Respect
We harness the power of diversity and inclusion in our business, trust those we work with, and value everyone’s contribution.

Integrity
We operate with honesty, transparency and fairness in all we do.

Service
We act with empathy and humility, putting the people and businesses we serve at the centre of what we do.

Excellence
We champion innovation, and use our energy, expertise and resources to make a positive difference.

Stewardship
We prize sustainability, and are passionate about leaving things better than we found them.

Values
Our moral compass; what we believe is right
Respect, Integrity, Service, Excellence, Stewardship

Mindset
How we get things done
Empower, Challenge, Drive

The power of who we are is greatest when we are bound together by a common Purpose, shared Values and a single Mindset.
The Barclays Way...
How we behave
Our five Values are our moral compass; the fundamentals of who we are and what we believe is right. Our Mindset (Empower, Challenge, Drive) shapes how we take action, living by our Values, driven by our Purpose, always with our customers and clients at the heart of what we do.

We apply our Values and Mindset consistently across the bank in everything we do. This means that we act fairly, ethically and openly and abide by standards which are, in many cases, higher than those set by the laws and regulations which apply to our business. And it means that we get things done.

In doing this, we apply a range of criteria over and above financial considerations, aimed at building a sustainable, strong and profitable business for the long term and adding value to our business relationships and the broader communities in which we live and work.

We benchmark our individual and corporate performance not just on commercial results, but also on how we demonstrate our Values and Mindset in our daily work.

As employees of Barclays we are all personally accountable for what we do every day. Personal accountability is central to our culture. How we behave is instrumental in achieving the highest standards of performance, adding value to our customers and clients and meeting our regulatory obligations.

In order to achieve this, we expect colleagues to:

1. Act with integrity
2. Act with due skill, care and diligence
3. Be open and co-operative with regulators
4. Treat customers fairly
5. Observe proper standards of market conduct.

Although these expectations apply in particular as part of the Individual Accountability Regime, Barclays expects all colleagues to comply with these requirements. Colleagues should therefore familiarise themselves with and adhere to the relevant policies covering the Individual Accountability Regime.

As employees of Barclays we are all personally accountable for what we do every day.

1 Colleagues in scope of the Individual Accountability Regime are Senior Managers, Material Risk Takers, Certified Individuals, all UK (excluding ancillary staff) and overseas colleagues who have the potential to deal with UK customers.
Our role in society

Banks play a key role in connecting the providers and users of capital. Barclays recognises this role in serving society, and our success as a business has always been inextricably linked to the progress of the people, communities and businesses that we serve. As society’s expectations of businesses continue to evolve, we aim to stay ahead of those expectations. It is by focusing on our core products and services, and our relationships that we can make the greatest positive impact.

We know that our success over the long term is based not just on how well we run the organisation commercially, but also on how well we manage it to protect the environment, support positive social progress, and make responsible, well-governed decisions.

We are focused on the areas where we can have the greatest long-term impact: making growth ‘green’, sustainable and inclusive; managing the environmental and social impacts of our business; running a responsible business; and investing in our communities.

Becoming net zero by 2050

We believe that Barclays should take a leading role in tackling climate change and help accelerate the transition to a low-carbon economy. Our ambition is to become a net zero bank by 2050. And we’ve made a firm commitment to align our entire financing portfolio to the goals of the Paris Agreement. That means our own operations, and the financing we do for our clients, in every sector, will support the goal of limiting global warming.

COVID-19 Community Aid Package

To support our communities deal with the unprecedented social and economic crisis caused by COVID-19, Barclays has established a £100m COVID-19 Community Aid Package: £50m will be donated to charity partners around the world to support vulnerable people impacted by the crisis and £50m has been committed to match colleagues’ personal donations and active fundraising efforts for their chosen charities supporting COVID-19 relief.

In doing this we:

- take account of the broader impacts of our business operations. This includes identifying all those who may be affected (directly and indirectly) by those decisions, and making critical evaluation of social and environmental impacts an integral part of our assessment of client financial propositions, supplier relationships and the development of new products
- manage our responsibilities to support governments and civil society organisations in respecting and upholding human rights principles wherever we operate
- manage our environmental impact through financing the growth of renewable energy sources and next generation technologies, taking a responsible and sustainable approach to the necessary financing of energy sources with a higher environmental impact. We aim to maintain and improve our progress on reducing the carbon footprint of our own operations and supply chain throughout the world
- partner with leading charities and not-for-profit organisations to deliver impactful programmes in the communities where Barclays operates
- support colleagues in undertaking volunteering and charitable matched fundraising in their local communities.
Customer/Client – delivering excellent service

At Barclays we strive to create and maintain mutually beneficial long-standing relationships with personal, business, institutional and international customers and clients that meet their needs and exceed their expectations. This means taking personal responsibility for understanding the financial advice and support that they need to achieve their goals, and ensuring that creative solutions are provided that enable them to make well-informed choices in support of their short and long-term goals.

Our objective is to offer good value and to deliver this via excellent and consistent customer and client service. We take pride in our reputation for providing innovative products and ideas that allow us to help our customers and clients manage their financial affairs better, thereby making a real and lasting difference to the lives of customers and communities.

In doing this we:

• communicate clearly without jargon and are transparent about fees and charges, ensuring these are fair and reasonable
• conduct sales, advertising and marketing of our products and services with integrity and do not make false, misleading or exaggerated claims
• do not offer customers and clients products that are not right for them
• maintain confidentiality of customer and client information
• deliver on our promises and take personal responsibility for putting things right when they go wrong
• resolve complaints diligently, fairly and quickly and measure customer/client satisfaction

• take a responsible approach to clients who find themselves in financial difficulty
• evaluate the broader risks and impacts of business propositions and products to anticipate and rectify adverse effects
• avoid undeclared actual or potential conflicts of interest, or behaviour that may be perceived as a conflict of interest. This may be an actual or perceived conflict between an individual’s personal interests and the interests of Barclays as a whole (including our shareholders, supplier relationships, customers and clients), a conflict between the interests of two or more clients, or a situation where Barclays prioritises its own interests over those of suppliers, customers and clients. Where we cannot avoid such conflicts, we are transparent about their existence and the steps taken to manage them proactively.

Our objective is to offer good value and to deliver this via excellent and consistent customer and client service.
Colleague – promoting respect, diversity and performance in the workplace

We want to make Barclays a great place to work, where we harness the power of diversity and inclusion in our business, trust those we work with, and value everyone’s contribution. We collaborate with colleagues in other parts of Barclays to deliver the best result for the bank, our customers and clients, and each other. We demand excellence and acknowledge – and take pride in – our achievements.

We foster a working environment in which colleagues are trusted, take responsibility for both success and failure – without allocating blame – and are encouraged to challenge decisions or behaviours they believe are wrong. Doing the right thing, and having the courage to speak up even when it feels uncomfortable, is an important aspect of the Barclays Way. No-one should experience any form of retaliation of any kind, as a result of reporting an issue.

In doing this we:

- act and are seen to act with the highest standards of conduct and integrity
- challenge and escalate issues of concern in a fair and clear manner
- welcome and foster diversity within our workforce
- take a no-tolerance approach to bias, bullying or harassment
- are committed to developing and maintaining our professional knowledge and skills
- support and coach colleagues in developing their skills and career and provide them with the necessary training and tools, including constructive feedback on their performance and behaviours
- take personal accountability for achieving high performance by setting challenging and stretching targets for ourselves and expect this of others
- are open minded to, and respectful of, others’ points of view
- recognise and celebrate colleagues’ achievements
- evaluate and compensate performance on the basis of how objectives are met, as well as what is delivered
- seek to employ and retain people who are exemplars of the Barclays way of working
- behave in a way that demonstrates that every single role within the bank is important, as are the people who occupy those roles
- recognise colleagues’ right to freedom of association and to participate constructively in dialogue with trade unions, work councils and other employee organisations
- provide a safe and healthy working environment, recognising that work/home balance is important and aids overall health, wellbeing and productivity
- make colleagues with line management responsibilities aware that they have an additional obligation to ensure that their teams are effectively supervised and supported to meet the high standards expected of us all and that they lead by example at all times.
Colleague conduct

Barclays expects that all employees act, and are seen to act, with the highest standards of conduct and integrity and in a way that promotes a diverse and inclusive culture. It is expected that employees will apply sound judgement and common sense to their standards of behaviour at all times, be guided by the Barclays Values and Mindset and act within the law.

This applies at all times to behaviour at work and work related meetings or where employee conduct may impact their ability to carry out their role. For example, colleagues are required to:

• be reliable and punctual
• present a professional appearance at all times (as appropriate to their working environment)
• be fit to carry out their jobs safely and effectively
• keep our working environment free from smoke (including simulated devices such as e-cigarettes), gambling and substance abuse

• respect and value people from all backgrounds. Barclays will not tolerate discrimination, bullying or harassment, including in relation to any employees, clients, customers, contractors, suppliers or other stakeholders and visitors to our premises
• behave appropriately at all work-related social events, and never act in a way inside or outside of work that brings Barclays into disrepute.

Matters requiring disclosure

All Barclays employees are required to inform their line manager or other appropriate contact of the following circumstances:

• any conflict of interest or outside business interest
• police arrest or caution, conviction for a criminal offence, judgements or court orders for criminal offences (excluding minor traffic offences)

• any actual or threatened litigation against them that would likely have an impact on Barclays, reputational or otherwise.
• changes in legal right-to-work status
• any adverse credit judgements’
• personal relationships at work, where the relationship may give rise to a conflict of interest. This may include relationships with someone in your line management chain or where you are involved in supervising or making commercial decisions which could impact the person with whom you have a personal relationship

• politically exposed person status or personal relationship (e.g. family or friend) to a client, customer, public official, regulator or other external stakeholder who has the authority to award business to Barclays or otherwise influence Barclays’ interests (as required by Barclays ABC Employment & Work Opportunity Standard).

These requirements apply to all business areas, subject to local policies and procedures and to any restrictions imposed by applicable local laws.

1 Unless local legislation expressly provides that the conviction does not have to be disclosed for the role you are carrying out.
2 If the requirement to provide this information is permitted by local law.
Managing risk – maintaining strong governance, robust controls and high ethical standards

At Barclays we use our energy, skills and resources to deliver high quality, sustainable results, taking account of the longer term as much as immediate achievements. We are committed to transparency in our disclosures and reporting, and to delivering a fair return to shareholders.

In managing our business, we appreciate that conducting our global activities with integrity and high standards of ethical conduct is fundamental to maintaining the trust and confidence of Barclays’ stakeholders, including clients and regulators. We have no tolerance for detriment to customers, clients, market integrity, effective competition or Barclays due to willful misconduct.

Barclays’ Enterprise Risk Management Framework (ERMF) governs the way in which we identify and manage our risks. All employees, regardless of their position, function or location, must play their part in the firm’s risk management. Employees are required to be familiar with risk management policies which are relevant to their responsibilities, know how to escalate actual or potential risk issues, and have a role-appropriate level of awareness of the risk management process as defined by the ERMF.

Where we engage with governments and regulators on issues relevant to our business, we are honest and transparent in our communication with them. Barclays is politically neutral; we do not participate in party political activities or make party political contributions.

In managing our relationships with suppliers, we seek mutually beneficial relationships based on merit and work through our supply chain to ensure that related environmental, social and ethical impacts are identified and managed appropriately. We acknowledge that free, fair and inclusive competition is good for business and customers and clients, driving innovation and improvements in service provision.

In doing this we:

• ensure that information is prepared in accordance with best practice standards and is sufficiently comprehensive to enable shareholders and other stakeholders to make an informed assessment of both our strategies and our future prospects

• take care to protect and enhance our reputation in everything that we do – our brand is more important to long-term stock market value and sustainable growth than short-term profits

• ensure that all information in our public and internal communications is honest, accurate, clear and timely

• make sure colleagues are familiar with and understand the controls and governance relevant to their roles, and that they undertake the relevant mandatory training

• take action in relation to anyone working for Barclays who does not act in a manner consistent with this code

• keep within the spirit, as well as the letter, of the law and regulation and apply high standards of professional and ethical conduct at all times.
• practice responsible risk management and due diligence in our decision making
• apply clear standards to tax planning for customers, clients and on our own account to ensure Barclays’ Tax Principles are upheld and we are fully compliant with the UK Code of Practice on Taxation for Banks
• take a no-tolerance approach to the willful facilitation of tax evasion in any country
• take a no-tolerance approach to bribery and corruption wherever it is encountered and do not make facilitation payments of any kind
• maintain an open, clear and transparent dialogue with our regulators and ensure all communications are timely, accurate and comprehensive
• do not offer, accept or solicit gifts or entertainment inappropriately as an inducement or means of influencing actions or opinions. Guidance on what is and is not acceptable is provided via the Barclays Anti-Bribery & Corruption (ABC) Expenditure Standard and relevant business procedures
• do not make any agreements of a formal or informal nature with competitors to fix or set prices or interest rates, restrict the supply of goods or services, engage in bid rigging or joint boycotts, allocate markets, agree not to poach employees, share commercially sensitive information or any other anti-competitive practice
• ensure that any engagement with government and political stakeholders – either elected representatives or civil service officials – is reported to the Government Relations team in the relevant jurisdiction
• ensure that any colleague involved in politics in a personal capacity keeps this entirely separate from their work at Barclays and strives to avoid any association between their politics and the bank, including ensuring that there is no actual or perceived conflict with their duties and responsibilities to the organisation
• promote an inclusive supply chain through outreach to small and medium-sized enterprises and businesses largely owned, controlled and operated by socio-economically under-represented segments of society
• ensure all interactions with external stakeholders (excepting customers and clients) in a professional capacity are managed and approved by an appropriate person within the relevant stakeholder team
• do not seek to damage the reputation of competitors directly, by implication or innuendo.
The Barclays Way...
Speaking up and raising concerns
At Barclays we expect colleagues to act with the highest standards of integrity and honesty in all that we do.

Speaking up and raising concerns

Colleagues should be able to take great pride in being associated with the Barclays name. This is why we must all be vigilant in ensuring that we live up to the Values, Mindset and associated behaviours that underpin our business and govern everything we do in our daily work.

Speaking up

Barclays Mindset is to Empower, Challenge and Drive. There may be times when we think that in some areas our Values are not being applied in the right way or may be overlooked. If we think this is happening, we must show the courage to challenge actions, decisions or behaviours that we believe to be wrong. We should also take care to listen to other colleagues and be open to challenge from them in return.

Sometimes the actions of a few may put our reputation at stake. If you believe something is not right – like misconduct, fraud or illegal activity – or if you feel that our standards are not being met, it is really important that you speak up.

Many people feel comfortable raising concerns directly to their management, Compliance, HR or Legal. You should seek to use these avenues, at least in the first instance. However, where you are not comfortable doing so, you can contact the Raising Concerns Team.

The Raising Concerns Team receive, assess and refer concerns to the most appropriate team for review and possible investigation.

It is important to remember that all matters raised through the Raising Concerns process will be treated seriously, reviewed by an appropriate team, and, where appropriate, investigated. The Raising Concerns team will manage all concerns sensitively and confidentially. Concerns could relate to a number of things, including a breach in our security, inappropriate conduct, financial crime, harassment, health, safety, environmental risks, or anything likely to harm the reputation of Barclays.

No-one should experience any form of overt or covert retaliation of any kind as a direct or indirect consequence of reporting an issue. If you have raised a concern, either to the Raising Concerns Team or otherwise, and believe you are now suffering detriment as a result, you should let the Raising Concerns Team know at the earliest opportunity.

If your concern is referred to the Whistleblowing Team by the Raising Concerns Team, be assured your concern will be taken seriously. We know it is not always easy to raise a whistleblowing concern, so the Whistleblowing Team are in place to support and guide you through the process.

A member of the Whistleblowing Team will contact you, give you the whistleblowing reference for your concern, and help you understand how your concern will be taken forward. They may request additional information or clarification on certain aspects of your concern.

You can be assured that all investigations are conducted in a thorough and proportionate manner and the Whistleblowing Team will connect with you throughout the process, also notifying you once the investigation is complete.

There are a number of ways to raise a concern, details can be found at the following link: https://now.barclays.com/WCP/content/intranet/en/about-barclays/raisingconcerns.html or just type Raising Concerns into your Barclays intranet browser for more information.
Supporting the Barclays Way...

Policies and guidance
Supporting the Barclays Way...
policies and guidance

Barclays has a range of policies and guidance setting out the control objectives, principles and other core requirements for the activities of the bank. Unless there are specific regulatory or statutory requirements in particular jurisdictions, all policies are expected to apply Group-wide.

For a complete list of policies and guidance, colleagues should refer to the Global Policy Hub on Barclays Now (the intranet). Colleagues should also refer to their local procedures, handbooks and guidance.
The Barclays Way...
Questions and answers
Questions and answers

What should I do if local law conflicts with other laws, internationally accepted standards or Barclays’ own policy?

If the provisions of this Code, internationally accepted standards or Barclays’ policy conflict with any local laws, you should discuss this with your line manager or local HR or local Compliance teams. In some circumstances local laws may, for example, prevent the disclosure of certain convictions or other information (such as credit information). In such circumstances we must adhere to those local laws and policies will be adapted locally to reflect this.

What should I do if I am attending a meeting or event with competitors and there is discussion about competitors’ pricing strategy or other confidential information?

Colleagues finding themselves in this situation should ask the meeting or event participants to desist from the discussion. If the discussion nevertheless continues, colleagues should leave the meeting immediately, making sure that their objections to the discussion are noted. In all cases, colleagues should report the incident to their line manager and to the Barclays Competition Legal team or their usual Compliance or Legal contact, as soon as possible after the meeting.

What should I do if I am aware of, or am asked to participate in, any activity or decision designed to circumvent Barclays policy or regulation, or which appears to push the boundaries of accepted practice to an unacceptable (or potentially unacceptable) extent?

If a colleague feels that a decision or activity they encounter is not in keeping with Barclays’ behavioural or policy commitments, they should raise this with their line manager or local Compliance team. If they are uncomfortable with this approach, they may raise the issue to the Raising Concerns Team.

What should I do if I am a politically exposed person (PEP) or I have a family connection to a client/customer/public official/ regulator or other external stakeholder?

In certain circumstances, your PEP status or family connections may create a conflict of interest and/or a bribery and corruption risk. You should speak to your line manager in the first instance and consider whether you are required to take any action, e.g. making a formal disclosure of your PEP status or personal relationship to an external stakeholder, under the Barclays ABC Employment & Work Opportunity Standard.

What should I do if a client or supplier (or potential client or supplier) offers me tickets to a major entertainment or sporting event?

Colleagues should refer to the Barclays ABC Expenditure Standard that provides criteria for the acceptance of hospitality. If a colleague still is not clear what is or is not permissible, they should consult their local Compliance team or the regional ABC team.

What should I do if I have concerns that a certain decision or way of working is not in keeping with the Barclays Way?

Concerns should be raised with the decision maker or appropriate line manager in the first instance. If this does not resolve the concern, or if a colleague feels uncomfortable in doing this, they should contact the Raising Concerns Team to raise the issue.
I am thinking of campaigning for a local political candidate, is there anything I need to do before going ahead?

Colleagues undertaking political activity should ensure this is conducted in a personal capacity, in their own time, and does not make use of Barclays’ resources or place Barclays’ reputation at risk. Any substantial commitment should be approved by the appropriate line manager. Colleagues in the United States who want to get involved in political volunteering activity must get prior approval from local Compliance.

What should I do if I am suspicious that a client or colleague is engaged in fraudulent or other illegal activity?

Colleagues in this situation should report their suspicions to their line manager, or local Fraud Risk team. The Barclays Fraud Risk Management Standard provides instruction and guidance on required actions.

What is the difference between the Raising Concerns policy and the reputation risk escalation procedure in the Barclays Reputation Risk Framework?

Barclays encourages colleagues who believe something is not right, to speak up. This is why we have a dedicated independent Raising Concerns process, where colleagues can receive your concern, assess it and refer it to the most appropriate team for review and possible investigation. Concerns could relate to a number of things, including a breach in our security, inappropriate conduct, financial crime, harassment, health, safety, environmental risks, or anything likely to harm the reputation of Barclays. The Reputation Risk Framework escalation procedure is part of the routine evaluation of decisions and is used by Barclays’ businesses and functions to assess and benchmark these from a reputation risk perspective.

My line manager is very supportive of Citizenship activity and has recommended that I attend a charity fundraising event that s/he is organising and apply for support through the Barclays Matched Fundraising programme. I don’t really know the charity, so should I attend and apply for matching?

The matched fundraising programme is available to support your fundraising efforts for the cause that you choose, so long as it meets the programme guidelines. The choice of charitable organisation or the decision to take part in an activity must be your own, and not influenced or requested by others e.g. your line manager, colleague, client or customer, charity or events management companies. It is therefore up to you to decide if this is the activity that you would like to be actively involved in and to put your annual matching towards. While colleagues and managers may share opportunities for you to take part in, colleagues should not feel compelled to be involved if they have other activity that they would rather support.

I’ve been asked by an external Barclays supplier/client to fundraise for a charity and use Barclays matching. Can I do that?

This could be perceived as a conflict of interest, particularly if you have a direct relationship or any kind of influence over the supplier or client/customer relationship. The Barclays Matched Fundraising programme was set up to support colleagues’ personal fundraising efforts; it is not to be used as a business relationship enhancement. As such activity might present an actual or perceived conflict of interest. For any concerns, please contact your local Compliance team.

February 2021

Registered office:
© Barclays Bank PLC 2021