



January 2025

Whistleblowing Policy

– making a Protected Disclosure





CONTENTS

A MESSAGE FROM YOUR WHISTLEBLOWERS CHAMPION	3
INTRODUCTION	4
SCOPE	4
WHAT IS A PROTECTED DISCLOSURE	5
HOW TO MAKE A PROTECTED DISCLOSURE	6
AIB Whistleblowing Team	6
External Reporting	7
HOW WE WILL DEAL WITH YOUR DISCLOSURE	8
Anonymous Disclosures	8
Escalation of a Concern	8
Confidentiality	9
Protection from Penalisation	9
SUPPORT	10
OTHER INFORMATION	10
ROLES & RESPONSIBILITIES	11
OWNERSHIP & GOVERNANCE	12
CONTACT DETAILS	13
APPENDICES	14
I Section 5 (3) of the Protected Disclosures Act 2014 (as amended)	15
II Section 43B of the Public Interest Disclosures Act 1998 (as amended)	16
III Section 14(a) of the Protected Disclosures Act 2014 (as amended)	17



A MESSAGE FROM YOUR WHISTLEBLOWERS CHAMPION

AIB Group has a set of core Values that help us deliver on our Purpose “**Empowering people to build a sustainable future**”.

Our Code of Conduct supports our Values and sets out clear expectations for how we behave and how we do business. It outlines that all of us have a specific responsibility to raise concerns about suspected or actual wrongdoing in the workplace. It is very important that we hear about such things at an early stage, so we can address any issues raised to minimise any damage or to contain it, in order to improve the way we do business.

In AIB, we are committed to ensuring that all of us work in a supportive and psychologically safe environment, where a positive workplace culture of openness, challenge and disclosure is encouraged and valued.

We do recognise that there may be circumstances when our people wish to report concerns or make disclosures of wrongdoing confidentially, or to use anonymous reporting channels.

Our **AIB Whistleblowing Policy** sets out how you can safely and confidentially make a disclosure about suspected or actual wrongdoing in the workplace, without fear of penalisation for having made the disclosure. It also outlines how you can make your disclosure and to the support available to you before or during the process.

The Group Board continues to place significant importance on ensuring that a values led culture is in place in the Group. As an AIB Board member and in my role as one of your Whistleblowers’ Champions, I have additional responsibilities to oversee the integrity, independence, and effectiveness of the AIB Whistleblowing Policy, specifically ensuring no one suffers penalisation or victimisation for making a disclosure.

I want to assure you that the Group Board and the Executive Committee takes the AIB Whistleblowing Policy extremely seriously and ensure that we have established best practice and effective whistleblowing arrangements in place, and that our approach to the management of protected disclosures is in line with our legislative requirements.

I encourage you to take the time to familiarise yourself with the **AIB Whistleblowing Policy** and continue to be personally responsible to make disclosures regarding suspected or actual wrongdoing in the workplace.

Thank you.



Sandy Kinney Pritchard

Whistleblowers Champion - RoI
Independent Non-Executive Director
AIB Group p.l.c.





INTRODUCTION

The Protected Disclosures Act 2014 in RoI, and the Public Interest Disclosures Act 1998 in the UK, were enacted into law to protect and empower workers to make a disclosure about wrongdoing in their workplace without fear of penalisation for having made the disclosure. This is sometimes referred to as Whistleblowing.

As our Whistleblowers' Champion has said, AIB's Whistleblowing Policy sets out how you can safely and confidentially make a disclosure about suspected or actual wrongdoing in the workplace, without fear of penalisation for having made the disclosure. It also ensures that we comply with our obligations under the respective legislation.

The Policy aims to:

- Encourage you to make a disclosure of suspected or actual wrongdoing and to feel safe doing so.
- Provide guidance on how you can make a protected disclosure within the Bank and externally.
- Provide reassurance that all protected disclosures will be treated with the utmost of confidentiality, and you will be protected from any form of penalisation for having made a disclosure.
- Provide feedback to those who make a protected disclosure.

The Policy does not apply to personal grievances that exclusively impact you, to bullying or harassment complaints, to complaints as a customer or to wrongdoing that is your job to detect.

If your concern relates to one of the above, you should refer to:

- The Bank's [Grievance Policy](#) which provides guidance on how to raise any grievances in relation to your own employment e.g. interpretation of conditions of employment, pay and benefits, changes to roles and responsibilities, professional working relationships.
- The Bank's [Anti Bullying & Harassment Policy](#) which provides guidance on how to address concerns related to any unwelcome behaviour.
- The Workforce Performance team in HR will provide independent support as subject matter experts on these policies - workforce.performance@aib.ie
- If you have another concern, including a breach of our Code of Conduct, you should report your concern to your people leader or escalate to senior management in the first instance. If you do not feel comfortable raising your concern within your business area or due to the nature of the concern, its seriousness, or for some other reason you can raise your concern [HERE](#).
- The AIB website where you will find more information and guidance on how to make a complaint as a customer - [AIB Help & Guidance Make a Complaint](#)

SCOPE

Who does the AIB Whistleblowing Policy apply to?

This policy applies to all those working in or for AIB Group in any jurisdiction, including, but not limited to, existing and former employees, candidates for employment, agency staff, tied agents, suppliers, contractors, consultants, shareholders, non-executive directors and those providing an outsourced service. This includes staff working in or for AIB's subsidiaries, including EBS d.a.c, Goodbody, AIB Mortgage Bank and AIB UK and contractor companies



WHAT IS A PROTECTED DISCLOSURE?

A Protected Disclosure is a disclosure of information, which came to your attention in a work-related context, which you believe shows any one or more of the following relevant wrongdoing, as defined in Protected Disclosure legislation.



(a) that an offence has been, is being or is likely to be committed,



(b) that a person has failed, is failing or is likely to fail to comply with any legal obligation, other than one arising under the worker's contract of employment or other contract whereby the worker undertakes to do or perform personally any work or services,



(c) that a miscarriage of justice has occurred, is occurring or is likely to occur,



(d) that the health or safety of any individual has been, is being or is likely to be endangered,



(e) that the environment has been, is being or is likely to be damaged,



(f) that an unlawful or otherwise improper use of funds or resources of a public body, or of other public money, has occurred, is occurring or is likely to occur,



(g) that an act or omission by or on behalf of a public body is oppressive, discriminatory or grossly negligent or constitutes gross mismanagement,



(h) that a breach of specified EU law has occurred, is occurring or is likely to occur, or



(i) that information tending to show any matter falling within any of the preceding paragraphs has been, is being or is likely to be concealed or destroyed or an attempt has been, is being or is likely to be made to conceal or destroy such information.

In AIB, relevant wrongdoing could include; failure to comply with regulations, codes (e.g. suspected or actual breaches of the Consumer Protection Code, Fitness & Probity regulation, Anti-Money Laundering legislation) or disclosures regarding theft or fraud.

You **must** make a disclosure under this policy if you believe that any of the above are happening, have happened in the past or are going to happen.



HOW TO MAKE A PROTECTED DISCLOSURE

You should make a disclosure about suspected or actual relevant wrongdoing as soon as possible to enable us to take any required corrective action.

1

AIB WHISTLEBLOWING TEAM

**via our Portal, Mailbox Phonenumber or
in-person meeting.**

(Full contact details on Page 13)

2

THE APPROPRIATE EXTERNAL REGULATOR OR BODY

(if appropriate)

(Full contact details on Page 13)

AIB WHISTLEBLOWING TEAM

The Head of Whistleblowing is the impartial person designated by AIB Group to handle any disclosures received by the Bank. They will follow up on disclosures, carry out an initial triage of the disclosure, maintain communication with the reporting person, and request further information from, and provide feedback to, the reporting person.

You can make a disclosure to the AIB Whistleblowing Team via the [Whistleblowing Portal](#), a confidential and secure web-based system, which is hosted by an independent third party.

Alternatively, you can:

- Complete the AIB Protected Disclosure Reporting Form (available [HERE](#)),
- Make a disclosure orally via the Whistleblowing phonenumber, or
- Request a meeting in person with the Head of Whistleblowing (or their delegate), if you wish to discuss your disclosure in person.

If the disclosure is made by telephone or in person, we will make notes of the disclosure and provide them for you to review to ensure they accurately reflect your disclosure.

All contact with the Whistleblowing Team will be kept confidential, and your identity will not be disclosed without your consent unless strictly necessary for legal or regulatory reasons or where required for our investigation. In such cases, we will discuss with you whether and how the matter can best proceed.



EXTERNAL REPORTING

We recommend that you make a disclosure internally in the first instance, if appropriate, as this will enable us to take steps to address your concern(s) directly and quickly.

However, you can make a disclosure about breaches of laws, regulations or codes, or malpractice or maladministration, directly with the appropriate external body, such as the Protected Disclosures Commissioner or to one of our regulators. Contact details are listed on Page 13. For example, you may wish to make a disclosure directly to an external body if you are uncomfortable doing so internally or if you feel we have not dealt with your concerns. Before reporting externally, you can contact the AIB Whistleblowing Team or Protect for advice.

You are not obliged to make your disclosure directly to AIB first, and you can make a disclosure both internally and externally if you wish.

The Central Bank of Ireland (CBI), the UK Financial Conduct Authority (FCA) and the UK Prudential Regulation Authority (PRA) have processes in place to deal with reports of possible breaches of financial services legislation, regulations or codes of practice.

In addition, certain senior staff members may be **obliged** to report concerns directly to the appropriate regulator, which are detailed below.

ROI





- Under Section 38 of the **Central Bank (Supervision and Enforcement) Act 2013**, if you perform a Pre-Approval Controlled Function (PCF), you are required to disclose to the CBI information relating to a breach of, or offence under, financial services legislation or the concealment or destruction of evidence relating to such an offence or breach, that you believe will be of material assistance to the CBI.
- Under the **Central Bank of Ireland's Individual Accountability Framework**, if you perform a PCF or CF1 role you have additional obligations as part of the Additional Conduct Standards (d) requiring you to disclose appropriately to the Central Bank any information of which they would reasonably expect notice.

UK

- Under the **Senior Manager Conduct Rules (SC4) of the FCA rules**, if you are a member of the UK Senior Managers Regime you are required to disclose appropriately to the FCA or PRA any information of which they would reasonably expect notice.



HOW WE DEAL WITH YOUR DISCLOSURE

PROTECTION 	<ul style="list-style-type: none"> Our priority is to protect you from any form of penalisation or victimisation for making your disclosure, and the risk of penalisation or victimisation is considered in each case. We will consider your particular circumstances, the nature of the disclosure, and any pre-conditions that could cause you to be vulnerable and if deemed appropriate suitable protection will be put in place.
ACKNOWLEDGEMENT & TRIAGE 	<ul style="list-style-type: none"> All disclosures made via the Whistleblowing channels will be acknowledged as soon as possible, and in any event, within 7 days of receipt. We will triage the disclosure and tell you whether the disclosure falls within the scope of the Whistleblowing Policy i.e. meets the definition of Protected Disclosure or falls within another policy or process, and what the next steps are.
INVESTIGATION 	<p>As part of the Triage process, we will decide how best to investigate your disclosure. There are a number of ways in which we investigate concerns, and our approach will depend on the issue you have raised, but our aim is always the same: to ensure that we gain a full understanding of what has happened and why.</p> <ul style="list-style-type: none"> We will let you know what approach to the investigation we will be taking. We may need to ask you for more information during the course of the investigation. Please do not try to investigate your concern by yourself. That could make it harder for us to carry out our own investigation, and also for us to protect your confidentiality. Once we conclude our investigation, we will decide what should be done based on what we have discovered. If we discover evidence of wrongdoing, then we will take action to address it.
FEEDBACK & OUTCOME 	<ul style="list-style-type: none"> We will keep you informed about the progress of our investigation and check in with you regularly (in any event, within 3 months of our acknowledging receipt of your disclosure). You are welcome to contact us at any time whilst the investigation is in progress to ask questions, raise concerns or provide feedback. Once the investigation concludes we will confirm the outcome to you in as much detail as we can. We cannot always share the detailed findings because of confidentiality obligations that apply to us. We will ask you for feedback at the end of the process. Feedback from people who have used this Policy provides us with valuable insight into how effective it is and how we might improve it. We conduct a Lessons Learned exercise at the conclusion of each whistleblowing investigation. Any actions arising from that exercise are recorded and tracked to completion.

ANONYMOUS DISCLOSURES

An anonymous disclosure will be treated in the same way as every other disclosure, and we will do our best to investigate. Disclosures made anonymously can make it much more difficult for us to investigate the matter, protect your position, or to provide you with feedback on the outcome. However, we would rather you made the disclosure anonymously than not at all.

The Whistleblowing Portal is a secure web-based system for making disclosures of wrongdoing and is hosted by an independent third party. It provides the option to make a disclosure anonymously (i.e. without disclosing your name or any personal information) while still communicating via the secure inbox with the AIB Whistleblowing Team.

ESCALATING A CONCERN

If you are not happy with how your disclosure was handled, you can contact the Head of Group Accountability & Performance, the relevant Whistleblowers' Champion for Ireland or the UK, the appropriate external regulator (contact details on Page 13) or our auditors.

CONFIDENTIALITY

This policy provides for confidential and protected disclosures of relevant wrongdoing and carries the full support of the AIB Group Board and Executive Committee.

That means that the we will treat your disclosure with the utmost discretion and confidentiality and will keep your identity confidential, if that is what you want. We will not disclose your identity without your consent, unless required to disclose it by law, regulation or it is strictly necessary for the purpose of an investigation. In such cases, we will discuss with you whether and how the matter can best proceed.

It should also be noted that, within the meaning of the Protected Disclosures Act 2014, failing to protect the identity of a reporter can be a criminal offence, unless it is necessary for legal or investigatory reasons, or unless the reporter has given consent.

You must also maintain confidentiality and not discuss your concern or any element of any investigation / process with any person.

PROTECTION FROM PENALISATION

Whether raised internally or externally, if you make a disclosure (even if your disclosure is unfounded or you were mistaken), you will be protected from any form of penalisation or victimisation for having made a disclosure. Anyone who facilitates, or assists a person making a disclosure, is also protected from penalisation or victimisation.

Penalisation is a widely defined term to cover any treatment by which the person making the disclosure feels impacted negatively. Penalisation can include, but is not limited to, threats of or doing any of the following: transfer of duties, suspension, demotion, unfair treatment, withholding training, unfair medical referrals, unfair performance reviews, exclusion, bullying, harassment, inappropriately disclosing the identity of the person making the disclosure, early termination or non-renewal of a contract of employment, or cancellation of an offer of employment.

We take a zero-tolerance approach to the penalisation or victimisation of anyone making a disclosure. Any form of penalisation or victimisation against staff making a disclosure is a breach of our Code of Conduct and will be referred under the disciplinary policy.

It should also be noted that, within the meaning of the Protected Disclosure Act 2014, penalisation, or the threat of penalisation, against a reporter or someone assisting a reporter is a criminal offence.

If you believe that you have been penalised or victimised for having made a disclosure, please let us know immediately whistleblowing@aib.ie. We will take immediate action to address your concern, and additional supports will also be provided to you.





SUPPORT

We recognise that making a disclosure under the AIB Whistleblowing Policy can be difficult. We will support you throughout the process. You can contact any of the below for support at any time during the Protected Disclosure process:



PROTECT - AIB subscribes to Protect, who offer free confidential advice to AIB staff in relation to Whistleblowing. Protect do not give any details of what is discussed on the calls or who is calling to AIB unless the caller specifically asks them to do so. Contact details are available on Page 13.



The Whistleblowing Team. Contact details are available on Page 13.



Our [Whistleblowing Advocacy Network](#) - a group of colleagues from across our business who are familiar with the Bank's Whistleblowing arrangements and can provide you with assurance in relation to making a disclosure under the Policy. Click [HERE](#) for details of your local advocate(s).



Your trade union representative / professional advisor (e.g. a solicitor)



AIB's Employee Assistance Programme

- VHI (for ROI employees)
Freephone: 1800 995 956 / **Email:** eap@vhics.ie
- Legal & General Spectrum Life (for NI and UK employees)
Freephone: 0800 316 9337 / **Email:** Adviceline@spectrum.life

OTHER INFORMATION

REPORTING

The AIB Group Board Audit Committee monitors and reviews the effectiveness of the Whistleblowing Policy and process. An anonymised report on Whistleblowing is provided to the Board (at least once a year) and includes details of the number and categorisation of protected disclosures received, and an analysis of trends and other issues to be aware of.

RECORDS

Records of Protected Disclosures are kept confidential and maintained in accordance with our obligations under data protection legislation.

ROLES & RESPONSIBILITIES

Everyone in scope for the policy is expected to comply with this policy at all times. Therefore, it is essential that each business area understands its roles and responsibilities in respect to this policy.

WHISTLEBLOWERS' CHAMPION, as a Non-Executive Director will:

- Oversee the integrity, independence, and effectiveness of AIB's Whistleblowing Policy and process, specifically to ensure no one suffers victimisation / penalisation because they have reported a concern.

HEAD OF WHISTLEBLOWING as owner of this policy will:

- Review it at least annually, in consultation with stakeholders, to ensure it addresses regulatory, legislative and best practice requirements.
- Have oversight for all concerns raised through the Whistleblowing channels and will manage such concerns in line with this policy.
- Provide independent support and advice on the policy and all Whistleblowing matters to those in scope.
- Develop training material for delivery through the annual mandatory COMeT programme.
- Report on the implementation of the policy as required to the CPO, Whistleblowers' Champions, AIB's Executive Committee and Board Committees.

ALL WORKING IN, FOR AND ON BEHALF OF AIB, as impacted persons:

- Understand and comply with our Whistleblowing Policy and the policies and procedures that apply to our own role.
- Make a disclosure of suspected or actual wrongdoing through the appropriate Whistleblowing channels outlined in the policy, in an honest, fair and professional manner.

PEOPLE LEADERS and BUSINESS AREAS, as the first line of defence will:

- Regularly communicate with your teams on the importance of understanding and complying with our Whistleblowing Policy.
- Encourage staff to make disclosures about wrongdoing and supporting staff who raise genuine issues or concerns including escalation through appropriate channels.

RISK, as second line of defence will:

- Carry out risk-based monitoring reviews of the implementation of the policy as required.
- Provide ongoing advisory support to the Whistleblowing Team on any potential People Risk, Financial Risk or any other risk implications associated with this policy.
- Undertake independent monitoring reviews of management adherence at business level, on a risk prioritised basis.

EMPLOYMENT LAW TEAM, as employment law experts will:

- Advise the Whistleblowing Team on the relevant regulation and legislation to be addressed in the policy and support the Whistleblowing Team in the development of policy material.
- Act as advisor to the Whistleblowing Team in the drafting, revisions and interpretation of legislative obligations and its applicability to the policy.
- Act as advisor to the Whistleblowing Team regarding queries on cases and scenarios, in determining if they meet legislative requirements.

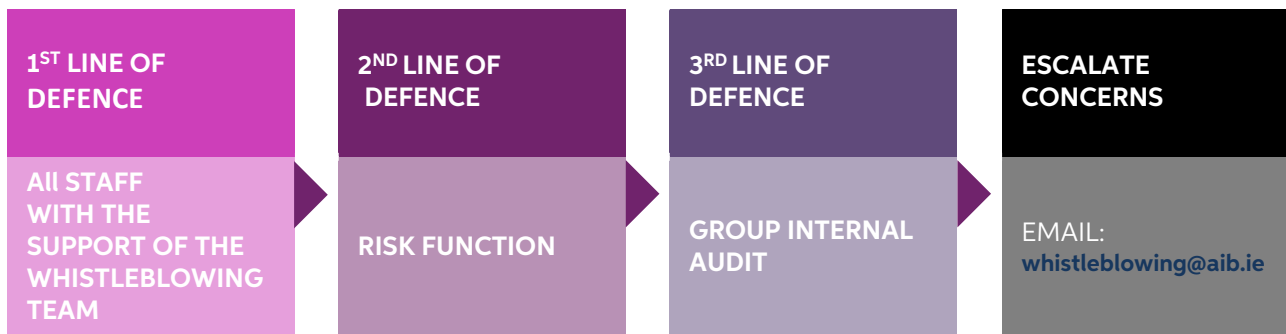
AUDIT, as third line of defence will:

- Carry out audits of the policy and its implementation from time to time and provide independent assurance to the Audit Committee of the Board on the effectiveness of this policy.



OWNERSHIP & GOVERNANCE

The 3 Lines of Defence Model is used to monitor and govern compliance with this policy. Where there are concerns about suspected abuse of this policy, this should be reported to your People Leader in the first instance. If further support is required, please contact the Whistleblowing Team - whistleblowing@aib.ie



Policy Implementation date:	01.01.2025
Last Review date:	01.01.2025
Last Updated with Changes:	01.01.2025
Policy is Reviewed/ Next Review Date:	Annually or if changes required by legislation or the business in the interim.
Policy Owned by:	Una Brennan, Head of Whistleblowing
ExCo Policy Sponsor:	David McCormack, Chief People Officer
Approval Authority for Material Changes:	Human Resources Senior Management Team



ADDITIONAL INFORMATION

[Whistleblowing Policy FAQs](#)

[Code of Conduct](#)

[Contents](#)[Introduction](#)[What is a Protected Disclosure?](#)[How to make a Protected Disclosure](#)[How we deal with your Disclosure](#)[Confidentiality
Protection from penalisation](#)[Support
Other Information](#)[Roles & Responsibilities
Ownership & Governance](#)**Contact Details**[Appendices](#)

CONTACT DETAILS

AIB WHISTLEBLOWING TEAM

	AIB Whistleblowing Portal	https://aib.integrityline.org
	AIB Whistleblowing mailbox	whistleblowing@aib.ie
	AIB Whistleblowing phonenumber	Ireland (Freephone) 1800 201 005 UK (Freephone) 0800 328 8217 USA (Freephone) 800 266 1967

WHISTLEBLOWER CHAMPIONS / NON-EXECUTIVE DIRECTORS

NAME	TELEPHONE	EMAIL	ADDRESS
Sandy Kinney Pritchard RoI Whistleblowers' Champion	00 44 7795 930992 00 353 87 134 9866	sandy.x.kinneypritchard@aib.ie	10 Molesworth Street, Dublin 2 (Mark Addressee Only)
Andrew Woosey UK Whistleblowers' Champion	00 44 7766 498328	andrew.d.woosey@aib.ie	13th Floor, 70 St Mary Axe, London EC3A 8BE (Mark Addressee Only)
Fergal O'Dwyer Goodbody Whistleblowers' Champion	00 353 87 238 1242	fergal.x.o'dwyer@aib.ie	10 Molesworth Street, Dublin 2 (Mark Addressee Only)

SUPPORT

PROTECT (Whistleblowing Charity)	Ireland (Freephone) 1800 665 126 UK (Freephone) 0800 997 8697 USA (Freephone) 011 44 207 4046609	advice23@protect-advice.org.uk https://protect-advice.org.uk/contact-protect-advice-line/
--	--	---

EXTERNAL REGULATORS

NAME	TELEPHONE	EMAIL	ADDRESS
Protected Disclosures Commissioner	00 353 1 639 5650	disclosures@opdc.ie	Office of the Protected Disclosures Commissioner, 6 Earlsfort Terrace, Dublin 2, D02 W773
Central Bank of Ireland Protected Disclosures Desk	1890 130 014	confidential@centralbank.ie	Protected Disclosures Desk, Central Bank of Ireland, PO Box 559, Dublin 1
Financial Conduct Authority (UK) Helpline	00 44 207 066 9200	whistle@fca.org.uk	Intelligence Department (Ref: PIDA), The Financial Conduct Authority, 12 Endeavour Square, London, E10 1JN
Prudential Regulation Authority (Bank of England) Helpline	00 44 203 461 8703	prawhistleblowing@bankofengland.co.uk	Reporting (Whistleblowing) PRA, 20 Moorgate, London, EC2R 6DA
Financial Industry Regulatory Authority (FINRA)	n/a	https://www.finra.org/contact-finra	

APPENDICES



APPENDIX I

SECTION 5 (3) OF THE PROTECTED DISCLOSURES ACT 2014 (as amended)

(3) The following matters are relevant wrongdoings for the purposes of this Act

- (a) that an offence has been, is being or is likely to be committed,
- (b) that a person has failed, is failing or is likely to fail to comply with any legal obligation, other than one arising under the worker's contract of employment or other contract whereby the worker undertakes to do or perform personally any work or services,
- (c) that a miscarriage of justice has occurred, is occurring or is likely to occur,
- (d) that the health or safety of any individual has been, is being or is likely to be endangered,
- (e) that the environment has been, is being or is likely to be damaged,
- (f) that an unlawful or otherwise improper use of funds or resources of a public body, or of other public money, has occurred, is occurring or is likely to occur,
- (g) that an act or omission by or on behalf of a public body is oppressive, discriminatory or grossly negligent or constitutes gross mismanagement,
- (h) that a breach has occurred, is occurring or is likely to occur, or
- (i) that information tending to show any matter falling within any of the preceding paragraphs has been, is being or is likely to be concealed or destroyed or an attempt has been, is being or is likely to be made to conceal or destroy such information.



APPENDIX II

SECTION 43B OF THE PUBLIC INTEREST DISCLOSURES ACT 1998 (as amended)

“qualifying disclosure” means any disclosure of information which, in the reasonable belief of the worker making the disclosure, tends to show one or more of the following

- (a)** that a criminal offence has been committed, is being committed or is likely to be committed,
- (b)** that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject,
- (c)** that a miscarriage of justice has occurred, is occurring or is likely to occur,
- (f)** that information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.
- (e)** that the environment has been, is being or is likely to be damaged, or
- (d)** that the health or safety of any individual has been, is being or is likely to be endangered,

APPENDIX III

SECTION 14 (a) OF THE PROTECTED DISCLOSURES ACT 2014 (as amended)

The Protected Disclosures Act 2014 (as amended) contains details of offence and related penalties. It should be noted these apply only where the concern is a 'relevant wrongdoing';

"14A. (1) A person who -

- (a) hinders or attempts to hinder a worker in making a report,
- (b) penalises or threatens penalisation or causes or permits any other person to penalise or threaten penalisation against any of the following:
 - (i) a reporting person;
 - (ii) a facilitator;
 - (iii) any third person who is connected with a reporting person and who could suffer retaliation in a work-related context, including as a colleague or relative of the reporting person;
 - (iv) any legal entity that a reporting person owns, works for or is otherwise connected with in a work-related context,
- (c) brings vexatious proceedings against any person or legal entity referred to in paragraph (b)
- (d) breaches the duty of confidentiality in section 16 regarding the identity of reporting persons, or
- (e) fails to comply with the requirement in section 6(3) to establish, maintain and operate internal reporting channels and procedures referred to in the said section 6(3), commits an offence.

(2) A reporting person who makes a report containing any information that he or she knows to be false commits an offence.

(3) A person who commits an offence under subsection (1)(a), (b), (c) or (e) is liable—

- (a) on summary conviction, to a class A fine or to imprisonment for a term not exceeding 12 months, or both, or
- (b) on conviction on indictment, to a fine not exceeding €250,000 or to imprisonment for a term not exceeding 2 years, or both.

(4) A person who commits an offence under subsection (1)(d) is liable—

- (a) on summary conviction, to a class A fine or to imprisonment for a term not exceeding 12 months, or both, or
- (b) on conviction on indictment, to a fine not exceeding €75,000 or to imprisonment for a term not exceeding 2 years, or both.

(5) A person who commits an offence under subsection (2) is liable—

- (a) on summary conviction, to a class A fine or to imprisonment for a term not exceeding 12 months, or both, or
- (b) on conviction on indictment, to a fine not exceeding €100,000 or to imprisonment for a term not exceeding 2 years, or both.

(6) (a) Where an offence under subsection (1)(a), (b), (c), (d) or (e) or section 10F(14) or 12(5) or (6) has been committed by a body corporate and is proved to have been committed with the consent or connivance of or to be attributable to any neglect on the part of a person, being a director, manager, secretary or other officer of the body corporate, or a person who was purporting to act in any such capacity, that person as well as the body corporate commits an offence and shall be liable to be proceeded against and punished as if he or she committed the first-mentioned offence.

(b) Where the affairs of a body corporate are managed by its members, paragraph (a) shall apply in relation to the acts and defaults of a member in connection with his or her functions of management as if he or she were a director or manager of the body corporate.

(7) Summary proceedings for an offence under subsection (1)(e) may be brought and prosecuted by the Workplace Relations Commission."

Allied Irish Banks, p.l.c. is an authorised agent and servicer of AIB Mortgage Bank in relation to origination and servicing of mortgage loans. AIB Mortgage Bank – Registered office: 10 Molesworth Street, Dublin 2 and is registered in Ireland No 404926.

AIB Mortgage Bank is a wholly owned subsidiary of Allied Irish Banks, p.l.c. AIB Mortgage Bank is regulated by the Central Bank of Ireland.

Allied Irish Banks, p.l.c. Registered office: 10 Molesworth Street, Dublin 2. Registered in Ireland No 24173. Allied Irish Banks, p.l.c. is regulated by the Central Bank of Ireland.

Directors' names and particulars are available at the company's registered offices and on the AIB Group website.