



# Speak Up Policy

January 2026

# Background

## The Protected Disclosures Act

### What is it?

- People who speak up about wrongdoing perform a valuable public service. This is sometimes referred to as whistleblowing or as making a Protected Disclosure.
- Many important matters of public concern would never have come to light if workers hadn't reported their concerns
- Reporting persons or "whistleblowers" should not be treated unfairly or lose their job because they have spoken up about unlawful or improper behaviour
- There are legal protections against penalisation for reporting persons in Ireland
- The Protected Disclosures Act 2014 sets out how wrongdoing can be reported and how reporting persons are to be protected from penalisation
- The Act was amended in 2022 and there are now new obligations employers must fulfil.

The amended Act requires organisations with 50 or more employees to establish channels for their workers to report wrongdoing. This brings Payzone into the scope of the legislation.

### Who does the Act apply to?

The Protected Disclosures Act applies to persons in the public, private and not-for-profit sectors who report concerns about wrongdoing they have encountered in the course of their work.

The protections of the Act apply to:

- Employees
- Agency workers
- Contractors
- Trainees

- Volunteers
- Board members
- Shareholders
- Job applicants

## Introduction

Since 2018, Payzone Ireland Limited has two shareholders AIB (75%) and FiServ (25%).

The Speak Up policy sets out how Payzone meets its obligations under the Protected Disclosures Act.

It details how you can safely and confidentially speak up to raise a concern about suspected or actual wrongdoing in work, without fear of penalisation.

### In Summary you should remember the following:

- You should speak up
- We will listen and act
- You will be protected

### Who does this policy apply to?

This policy applies to all those working in or for Payzone, including, but not limited to, existing and former employees, candidates for employment, agency staff, tied agents, suppliers, contractors, consultants, shareholders, directors and those providing an outsourced service. This includes staff working in or for Payzone's subsidiaries.

### What type of concerns should be raised under this policy?

You should raise a concern under this policy if you have a genuine belief that an actual or suspected wrongdoing may have occurred, is occurring or will occur at work in or for Payzone – or that wrongdoing may be covered up. 'Wrongdoing' for the purposes of this

policy includes a breach of law, regulations, codes, our Code of Conduct (and related policies) or unethical behaviour or conduct.

### Below is a non-exhaustive list of examples of wrongdoing:

- Failure to comply with a legal obligation, any financial services rules, or laws (including EU laws), regulations, codes e.g. failure to comply with anti-money laundering legislation or the Consumer Protection Code.
- The commission of a criminal offence e.g. theft or fraud
- Failure to comply with our policies e.g. acting unethically and acting where there is an undisclosed conflict of interest on a relative's account.
- Security Breaches e.g. Information Security Breach, inappropriate access to Payzone's systems.
- Health and Safety breaches e.g. hazard in the workplace.
- Practices that could cause harm to Payzone, our staff and/or customers.

### Protection of people speaking up

This policy will protect you if you report a concern when you have a reasonable, genuine belief that there is wrongdoing in work in or for Payzone, even if you are mistaken in your belief. However, knowingly making a false or malicious report will result in a referral under our disciplinary procedure.

This policy does not apply to personal grievances that exclusively impact you, bullying and harassment complaints, complaints as a customer or wrongdoing that it is your job to detect. These types of concerns can be raised through the appropriate channels, namely, the Employee Grievance Procedure, the Anti-Bullying & Harassment Policy (Refer to Payzone Staff Handbook) or to your manager.

However, if in doubt as to where to raise your concern, you can contact the Speak Up team for advice.

## How to raise a concern

You should raise any concern you may have as soon as possible to enable Payzone to take any required corrective action. It is usually better to raise the concern with your manager in the first instance, as they may be able to deal with your concern quickly and easily. If you do not wish to raise the concern with your manager, or if you feel that your Manager has not adequately addressed your concern you can contact any of the below:

- Any other Payzone Manager
- AIB Whistleblowing Team via the confidential Whistleblowing Portal - <https://aib.integrity.app>/telephone line (1 800 201 005) or mailbox – [whistblowing@aib.ie](mailto:whistblowing@aib.ie)
- The appropriate external regulator or body (If appropriate)

The AIB Whistleblowing portal is a secure web-based system for reporting concerns hosted by an independent third party. It provides the option to raise a concern anonymously (i.e. without disclosing your name or any personal information) while still communicating via the secure inbox with the AIB Whistleblowing Team.

You can raise a concern anonymously via the Whistleblowing channels, however anonymous reports may make a complete investigation more difficult and sometimes impossible as we cannot obtain further information from you. Also, if you report anonymously, we cannot give you feedback following any investigation or take active steps to support you.

## External Reporting

We recommend that you raise your concern internally in the first instance, if appropriate, as this will enable us to take steps to address your concern directly and quickly. However, you can raise concerns 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 contained at the end of this Policy. For example, you may wish to report directly to an external body if you are uncomfortable raising the issue internally or feel we have not dealt with your concerns. Before reporting externally, you can contact the AIB Whistleblowing Team or Protect, whom AIB subscribes to for free confidential advice to our people in relation to Whistleblowing.

You are not obliged to report the concern directly to Payzone first, and you can report a concern both internally and externally if you wish.

## How Payzone will deal with your concern

We will address all concerns raised through this policy.

If you have raised a concern with your manager and it is straightforward, your concern maybe addressed directly by him/her informally. Your manager will let you know the general outcome.

If you refer a concern to the AIB Whistleblowing Team, it will be acknowledged as soon as possible, and in any event, within 7 days of receipt. We will review the concern and tell you whether the concern falls within the scope of the Payzone Speak Up Policy or another policy or process and what the next steps are.

If you make a report orally (e.g. through the Whistleblowing phone line), you may request a meeting in person with the Head of Whistleblowing (or their delegate) if you wish to discuss your concern in person.

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

How we deal with a concern depends on the issues raised. We will review the concern, determine the issues and decide how to proceed, for example, we may investigate, and/or escalate your concern to relevant Business Area.

**Please note** that you should not investigate the matter yourself, as this might impair any investigation by Payzone and breach confidentiality.

We aim to keep you informed as much as possible on how we are dealing with the concern. We will provide you with feedback within a reasonable timeframe, and in any event, within 3 (three) months of our acknowledging receipt of your concern. If the investigation takes longer than 3 months to conclude, we will update you, at a minimum, at 3-month intervals.

If we conclude that there has been wrongdoing, corrective action will be taken. If we conclude that no wrongdoing has occurred, the case will be closed.

You will be notified of the general outcome, although we might not be able to share all the findings with you, as the findings and actions could be confidential.

## Escalating a Concern

If you are not happy with how your concern was handled, you can raise it with another Payzone Manager, with the AIB Whistleblowing Team, the appropriate external regulators, or our auditors.

## Protection

Whether raised internally or externally, if you have raised a concern about suspected wrongdoing in the workplace (even if your concern is unfounded or you were mistaken), you will be protected from any form of penalisation for having raised a concern. Anyone who facilitates, or assists a person raising a concern of wrongdoing, is also protected from penalisation.

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 raising the concern or
- Early termination or cancellation or renewal of a contract.

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

It should also be noted that if your concern is a 'Protected Disclosure' within the meaning of the Protected Disclosure Act 2014 (as amended), penalisation, or the threat of penalisation, against a reporter or someone assisting a reporter is a criminal offence.

If you feel that you have been penalised for having

raised a concern, you should immediately report this to the Head of

Whistleblowing([whistleblowing@aib.ie](mailto:whistleblowing@aib.ie)). These reports will be investigated without delay.

## Confidentiality

This policy provides for confidential and protected reporting of relevant wrongdoing and carries the full support of the Payzone Board and Leadership. That means that the person who receives that concern will treat your concern with the utmost discretion and confidentiality and will keep your identity confidential, if that is what you want, unless required to disclose it by law, regulation or it is strictly necessary for the purpose of an investigation.



It should also be noted that if your concern is a 'Protected Disclosure' within the meaning of the Protected Disclosures Act 2014 (as amended), 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. Any breach of confidentiality may result in disciplinary action.

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## Support

We recognise that raising a concern under the Speak Up 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 Speak Up process:

- The person to whom you raised your concern of wrongdoing in the workplace.
- PROTECT – AIB subscribes to protect, who offer free confidential advice to to AIB /Payzone staff in relation to SpeakUp/Whistleblowing) contact details below
- The AIB Whistleblowing team (details below)
- Your legal advisor
- VHI, AIB's Employee Assistance Provider

AIB Whistleblowing Team		PROTECT
Portal	<a href="https://aib.integrityline.app">https://aib.integrityline.app</a>	<a href="mailto:advice23@protect-advice.org.uk">advice23@protect-</a>
Mailbox	<a href="mailto:whistleblowing@aib.ie">whistleblowing@aib.ie</a>	<a href="https://protect-advice.org.uk/contact-protect-advice-line/">advice.org.uk</a> <a href="https://protect-advice.org.uk/contact-protect-advice-line/">https://protect-</a> <a href="https://protect-advice.org.uk/contact-protect-advice-line/">advice.org.uk/contact-protect-</a> <a href="https://protect-advice.org.uk/contact-protect-advice-line/">advice-line/</a>
Phoneline (Freephone)	Ireland - 1800 201 005 UK - 0800 328 8217 USA - 800 266 1967	Ireland - 1800 665 126

## External Regulators

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 Whistleblowing Desk	1890 130 014	confidential@centralbank.ie	Protected Disclosures Desk, Central Bank of Ireland, PO Box 11517, Spencer Dock, North Wall Quay, Dublin 1, D01 W920

## Roles and 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.

### Speak up team

As owners of this policy we will:

- Review it at least annually, in consultation with stakeholders, to ensure it addresses regulatory, legislative and best practice requirements.
- Have oversight for all concern raised through the Speak Up channels and will manage such concerns in line with this policy.

- Provide independent support and advice on the policy and all Speak Up matters to those in scope.
- Develop training material for delivery to Payzone. Report on the implementation of the policy as required to Payzone's Board Committees.

## All working in, for and on behalf of payzone

As impacted persons you will:

- Understand and comply with our Speak Up Policy and the policies and procedures that apply to our own role.
- Escalate or report unacceptable conduct or suspected or actual wrongdoing to your People Leader or through the appropriate Speak Up channels outlined in the policy, in an honest, fair and professional manner.

## Managers and business areas

As the first line of defence will:

- Regularly communicate with your teams on the importance of understanding and complying with our Speak Up Policy.
- Encourage staff to Speak Up and raise concerns about wrongdoing and supporting staff who raise genuine issues or concerns.
- Be accountable for all concerns raised, ensuring they are resolved in a timely and fair manner and, if appropriate, are promptly escalated through appropriate channels.

## Risk and compliance

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 Speak Up 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.

## Guide for Managers



Recognise that someone is speaking up	Thanks staff member for speaking up	Investigate?
Listen to issue	Provide assurance – issue will be kept confidential, no penalisation for having raised issue	Take corrective action?
Understand what has been raised	Offer support	Refer to Speak Up Escalation process with consent of employee
Ask questions if needed	Discuss planned corrective action with staff member	Document actions
Take notes – keep confidential	Regular communication and updates	Notify relevant stakeholders BUT retain confidentiality
Arrange a follow-up meeting if needed		
<b>Maintain confidentiality</b>		
<b>Protection from penalisation</b>		

Policy Implementation Date: December 2023

Last Review Date: November 2024

Last Updated with Changes: November 2025

Policy is Reviewed /Date:

Annually or if changes are required by legislation or the business In the interim

Policy Sponsor: Chief Finance Officer

Approval Authority for Material Changes: Risk & Control Committee