

## Voluntary Application for Imposition of Requirements

Barclays Bank UK plc ("**Barclays**")

Firm Reference No. 759676

To: The Financial Conduct Authority (the "**FCA**").

FAO: Laura Dawes, Head of Department.

Barclays hereby applies to the FCA under section 55L of the *Financial Services and Markets Act 2000* for the imposition of requirements on its Part 4A authorisation in the terms set out below:

1. In respect of each of the calendar years 2018, 2019 and 2020, Barclays must provide the Authority with written confirmation of:
  - (a) the number of whistleblowing cases opened and/or investigated in the relevant year that involve allegations against a Senior Conduct Rules Staff Member and/or Director of the Group (the "**Subject**"). For each case so identified, Barclays must also provide the Authority with:
    - i. a written overview setting out the Subject's identity, the nature of the allegations made, the steps taken by Barclays to investigate the allegations, including the management oversight and reporting structure of that investigation, any conclusions reached and any resulting outcome;
    - ii. a copy of GCWT's records evidencing the matters in (i);
  - (b) the number of instances in that year where the Group has sought to identify an anonymous Whistleblower. For each instance so identified, Barclays must also provide the Authority with:
    - i. a written overview setting out the steps taken by it to follow the process set out in the Whistleblowing Policy in relation to identifying an anonymous Whistleblower;
    - ii. a copy of GCWT's records evidencing the matters in (i);
  - (c) the number of instances in which a person has in that year alleged to the Group that, as a Whistleblower, they were the subject of retaliation or other detrimental action by the Group. For each instance so identified, Barclays must also provide the Authority with:
    - i. a written overview setting out the steps taken by it to investigate those allegations, the conclusions reached in that investigation and any resulting outcome; and
    - ii. a copy of GCWT's records evidencing the matters in (i).

If in relation to a given instance/case Barclays is unable to provide all of the material required (e.g. as its investigations have not yet concluded), Barclays shall confirm the material it cannot provide and shall provide it as soon as reasonably possible.

2. Barclays must provide the Authority with the material required by paragraph (1) in a single submission by 5pm on 31 March of the calendar year following the year to which that material relates.
3. Barclays must by 5pm on 31 March of each of 2019, 2020 and 2021 provide the Authority with a signed attestation confirming that:
  - (a) it has complied fully with the requirements of paragraph (1) and the material provided thereunder in relation to the previous calendar year is accurate and complete;
  - (b) its systems and controls in the preceding calendar year complied with the requirements of SYSC 18 or, in the event Barclays cannot attest such

- compliance, specifying all of the deficiencies that have been identified and explaining the steps Barclays will take to resolve them; and
- (c) all Senior Conduct Rules Staff Members and Directors of the Group have completed training in the preceding calendar year on Barclays' internal whistleblowing arrangements, such to include (but not be limited to) how to recognise and respond to a disclosure by a Whistleblower.
4. As regards the attestation required under paragraph (3) above, Barclays must ensure that:
- (a) it is provided to the Authority in the form of a certificate containing the matters required by that paragraph;
  - (b) it is signed by its Whistleblowers' Champion or, in his absence, the Group Head of Compliance or an executive member of Barclays' Board of Directors and prior to its submission to the FCA is provided to the Group Whistleblowers' Champion.; and
  - (c) the attestor undertakes all reasonable due diligence (with the benefit of such assistance as they may require from Barclays) in order to satisfy themselves that the attestation provides an accurate and complete account of the matters in paragraph (3) above.
5. In Barclays' view, the material provided under paragraph 1 may contain confidential information relating to the Group and its employees.
6. For the purposes of paragraphs (1) to (5) of this document, the following terms shall have the following meanings:
- (a) "Director" means any executive or non-executive director.
  - (b) "GCWT" means the Group's Global Compliance Whistleblowing Team or such other team within the Group that has responsibility from time to time for investigating concerns raised/allegations made by Whistleblowers in connection with Barclays.
  - (c) "the Group" means Barclays Bank plc for the period up to March 2018; and Barclays Bank plc, Barclays Bank UK plc, Barclays Services Ltd and Barclays plc from 1 April 2018.
  - (d) "the Handbook" means the Authority's Handbook of rules and guidance as in force from time to time.
  - (e) "Senior Conduct Rules Staff Member" has, in relation to Barclays, the meaning given to that term in the Authority's Handbook from time to time.
  - (f) "SYSC 18" means chapter 18 of the 'Senior Management Arrangements, Systems and Controls' sourcebook in the Authority's Handbook, as in force from time to time.
  - (g) "Whistleblowers" has the meaning given to that term in the Authority's Handbook from time to time (and the singular term 'Whistleblower' shall be interpreted accordingly).
  - (h) "Whistleblowing Policy" means the policy (including any and all procedures and/or guidance supporting that policy) that applies to Barclays from time to time, which relates to disclosures by Whistleblowers and/or the requirements of SYSC 18 more generally.

Signed: ..... for and on behalf of Barclays

\_\_\_\_\_

Date: .....