

# Political and Public Policy Engagement Policy

Document Type	Internal
Last Approval Date	12/12/2024
Owner	Daniel Macey, Public Affairs Lead, External Affairs
Sponsor	Fiona Cannon, Chief Strategy & Sustainability Officer
Approval Body	Conduct Risk Committee
Current Date of Approval	11/02/2026
Next Approval Due Date	14/12/2026

## Version history

Version	Status	Approved by	Date Approved	Comments / Changes made
V1	Approved	YBS Board	22/09/2021	Approval given by YBS Board.
V2	Approved	YBS Board	21/09/2022	Approval given by YBS Board.
V3	Approved	Executive Committee	20/09/2023	Approval given by Executive Committee. Agreed to be reduced to Tier 2 and approved in future by the Commercial Risk Division Committee.
V4	Approved	Commercial Risk Division Committee	12/12/2024	Approval given by Commercial Risk Division Committee.
V5	Approved	Conduct Risk Committee	11/02/2026	Approval given by Conduct Risk Committee.



1. Purpose .....	2
2. Scope .....	3
3. Definitions .....	3
4. Policy Statements .....	3
5. Implementation.....	5
6. Monitoring .....	6
7. Approval .....	6
8. Roles & Responsibilities .....	6
9. Variations.....	7
10. Non-Compliance.....	7

### 1. Purpose

The purpose of the policy	The Political and Public Policy Engagement Policy sets out the approach to lobbying taken by the Society and its representatives. This policy supports representatives of the society to carry out lobbying where we have a legitimate interest in a transparent, responsible, politically impartial way.
Applicable Regulations and Legislation	<ul style="list-style-type: none"> <li>• UK Lobbying Register</li> <li>• Scottish Parliament Lobbying Register</li> <li>• CIPR Code of Conduct</li> <li>• The FCA Principles of Business</li> <li>• PRCA Register of Consultant Lobbyists</li> </ul>
Requirements of the policy	This policy requires representatives of the Society to follow defined standards for lobbying activity in all meetings with external political, public policy or civic stakeholders; to seek to ensure that third parties with whom the Society works on lobbying abide by similar standards; and to report details of meetings held with senior officials for external publication.
Related policy guides	<ul style="list-style-type: none"> <li>• Social Media Policy – Addresses communications through social media channels.</li> <li>• Media, Communications and Public Speaking Policy – Addresses communications with the media and public speaking.</li> <li>• Information Security Policy – Addresses protecting information, including confidential, private and personal data</li> </ul>

## 2. Scope

The policy applies to	All Society colleagues.
The policy excludes	This policy excludes political or policy engagement undertaken in a personal capacity, by colleagues or third parties in their own time, where the Society does not have an interest.
The policy relates to	This policy relates to external engagement with political, public policy or civic stakeholders; undertaken by representatives of the Society.

## 3. Definitions

- Lobbying - for the purposes of this policy, lobbying is defined as activity undertaken to engage with or influence government (UK-wide, devolved nations, regional and local), elected representatives, or civil servants in favour of the interests of the Society and its members and customers.
- Engagements - Can be written, verbal or in person.
- Reportable Engagements - Engagements undertaken on behalf of the Society with the following list of stakeholders:
  - Members of the UK Government, the Scottish Government, and the Welsh Government
  - Special Advisors to members of the above governments
  - Elected Members of the UK, Scottish and Welsh Parliaments
  - Elected Mayors and Leaders of UK local authorities
  - Permanent Secretaries of UK Civil Service departments
- Representatives (of the Society) - Colleagues and third-party organisations or individuals who conduct lobbying directly on the Society's behalf. For the purposes of this policy, this would not ordinarily include industry representative bodies.

## 4. Policy Statements

- The Society will not engage in lobbying activity unless it is in the legitimate interests of the Society and its members and customers, which will be determined by the Policy Owner.
- The Society will remain politically impartial and no political donations will be made by or on behalf of the Society. From time to time colleagues may need to incur expenditure with political parties or organisations to cover activities that are an accepted part of engaging with stakeholders, such as fees for attendance at political party conferences. These activities do not confer support for any political party or to influence public support for any party. Such requests for expenditure should be agreed in advance with the Senior Manager – External Affairs to ensure they do not constitute a political donation.
- Employees and third-party representatives of the Society will maintain the highest standards of professional endeavour, integrity, confidentiality, financial propriety and personal conduct and responsibility when undertaking lobbying activity; as well as being bound by the relevant standards set out in wider Group policies such as the Financial Crime Policy.

- Colleagues involved in political activity in a personal capacity are responsible for ensuring this is kept entirely separate from their duties as an employee and that YBS funds or resources (including time) are not used for political purposes.
- Those undertaking lobbying activity on behalf of the Society will be responsible for ensuring they and the Society comply with all local laws regarding the disclosure of lobbying activity and expenditure. The Public Affairs Lead will provide advice on how to maintain compliance.
- A register of Reportable Engagements will be compiled by the Public Affairs Lead and published on the Society's website on a monthly basis. Those engaged in lobbying are responsible for promptly declaring the required details of Reportable Engagements to the Public Affairs Lead.
- Any hospitality given and/or received will be declared internally.
- A summary of all Reportable Engagements and hospitality will be shared with the Board on an annual basis.
- Where representatives of the Society are due to be engaged in lobbying activity in collaboration with third parties, they will seek to ensure that those third parties abide by similar ethical standards on lobbying. Advice will be sought from the Public Affairs Lead if necessary.
- Only colleagues who have completed relevant training arranged by External Affairs and are on its list of approved spokespeople can lobby on behalf of the Society.
- Unless a colleague has received training organised by External Affairs, and the colleague has been approved to be a spokesperson, they are not allowed to lobby on behalf of the YBS Group.
- Training will usually only be provided to senior leaders or senior business experts. Requests for media training must be made to External Affairs.
- An up-to-date list of approved spokespeople and their relevant subject areas is maintained by External Affairs.
- Representatives of the Group presenting at public external events, such as conferences or seminars, which involve audience or moderator Q&A sessions should be aware of the potential risk posed by their words, especially if policy makers are present.
- Anyone who wishes to proactively lobby policy makers must contact External Affairs.
- YBS holds membership of a number of trade associations or industry groups, some of which may engage with political stakeholders on topics that are of relevance to our business. YBS or its subsidiary, Accord Mortgage, holds membership of the following bodies:
  - Building Societies Association
  - City of London Corporation
  - Intermediary Mortgage Lenders Association
  - Financial Intermediary and Broker Association
  - ISBA
  - National Association of Commercial Finance Brokers
  - TheCityUK
  - UK Finance
  - West and North Yorkshire Chamber of Commerce

## 5. Implementation

A copy of the policy document will be made available on the Policy page of the Society's Intranet and shared with third parties who may be involved in lobbying activity on the Society's behalf.

A version of the policy document will be published on the Society's external website, alongside a register of Reportable Engagements which will be updated monthly.

## 6. Monitoring

The Public Affairs Lead will manage engagement with the Policy by relevant stakeholders, including those who undertake or may undertake lobbying activity on the Society's behalf. Such engagement will stress the importance of compliance with the Policy.

Employees and representatives of the Society are individually responsible for maintaining compliance with the principles and controls outlined in the Policy. This includes responsibility for the reporting of lobbying activities to the Public Affairs Lead. Any concerns can be raised via the Society's Whistleblowing Process or [Customer Complaints Process](#).

Non-compliance will be reported to the Policy Sponsor.

## 7. Approval

- The Policy is approved at Conduct Risk Committee on an annual basis.

## 8. Roles & Responsibilities

### Policy Owner

The Policy owner is responsible for:

- Developing the Policy document and ensuring that it remains up to date at all times.
- Reviewing the policy periodically and in the event of any significant change (e.g. legislative, regulatory, organisational, operational etc.).
- The Policy Owner should obtain endorsement for the Policy from the Sponsor prior to seeking approval from the relevant Committee.
- Communicating the policy to all affected colleagues, ensuring that adequate supporting training is developed and delivered as required.
- Monitoring the application of the Policy, taking steps to ensure compliance with the Policy and report non-compliance to the Policy Sponsor and Enterprise Risk Management team.
- Ensuring the relevant policy guides are aligned to the policy.

### Policy Sponsor

The Policy sponsor is accountable for all aspects of the policy.

- The Policy sponsor is responsible for:
- Providing direction to the Policy owner as required.

- Supporting the Policy owner in discharging their responsibilities, specifically ensuring sufficient investment is made available to enable implementation and monitoring of policy adherence.
- Endorsing the Policy prior to it being submitted to the relevant governance committee for approval.
- All colleagues must adhere to the requirements and duties placed upon them by the policy.

## 9. Variations

Formal variations to the Policy are not anticipated and should only occur in exceptional circumstances.

## 10. Non-Compliance

Failure to comply with the Policy may result in breach of the Society's risk appetite, which may threaten the ability of the Society to meet its strategic objectives and, in extreme circumstances, threaten the continued existence of the Society. Failure to comply with the Policy may also result in a breach of regulation which in turn may lead to significant regulatory censure and fines.

If a colleague fails to comply with the Policy, this non-compliance should be reflected within their performance assessment. Action or inaction resulting in a significant adverse outcome may result in formal disciplinary action.