



AIB (NI)

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**Peter Hall
Clerk to the Committee for Finance
Parliament Buildings
Stormont
Belfast
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3 JUNE 2025

Dear Peter,

Thank you for your letter seeking additional responses to a number of topics following the bank's appearance at the Northern Ireland Assembly Committee for Finance.

I appreciate the opportunity to provide further clarification on matters raised and have set out AIB NI's response to those below.

1. Any ethical focus that the banks apply to their investment activity and payment of dividends, and any wider policy involving an ethical stance

As one of the biggest banks across the island of Ireland, AIB has a significant reach into society, creating value and making impact through our activities.

We recognise the responsibility that comes with the scale and impact of our business, and we aspire to contribute and advocate for a fairer society that is socially and economically inclusive. We do this by investing and raising awareness in access, education and innovation for our customers, our colleagues and our communities.

We do business conscientiously; we arrange finance responsibly to support our customers and mitigate financial crime and we only partner with others who exhibit an ethos of fairness and sustainability.

We have a range of policies and practices in place to help ensure that we adhere to the highest ethical standards in how we do business and who we do business with. Here are three key areas:

1. Human rights and equality

We respect human rights in accordance with internationally accepted standards; our Human Rights Commitment has been shaped by the UN Guiding Principles on Business and Human Rights. Our commitment operates alongside our Responsible Supplier Code and is aligned to the European Convention on Human Rights and the EU Charter of Fundamental Rights.

2. Inclusion and Diversity

We put people at the centre of everything we do, by ensuring that our workforce feels supported and empowered at work, with strong gender balance at every level, good work-life balance and universal inclusion.

Our customers are at the heart of our business. We promote financial wellbeing by continually adapting our services and products to meet the needs of all of our customers, throughout their life stages, paying close attention to customers with additional needs.

3. Sustainability and exclusions policy

Sustainability training is mandatory for all employees and is focused on ensuring an understanding of sustainability and its importance for business and for AIB, including what we finance and don't finance to protect people and nature.

At AIB, we have a strict exclusions policy that prohibits the provision of new money to businesses, or any of their subsidiaries, involved in a wide range of activities including animal welfare, adult entertainment, surveillance/arms related activities, health/genetic engineering, or energy and climate action.

2. The resolution of issues surrounding cross-border banking that were raised by Members

AIB Group (UK) plc is a UK authorised credit institution operating in Northern Ireland as AIB (NI). AIB NI is authorised and regulated by the UK Prudential Regulation Authority and UK Financial Conduct Authority.

Following Brexit and the UK's exit from the European market, AIB NI is no longer authorised as a credit institution from an EU regulatory perspective and does not have a banking licence to operate in the Republic of Ireland. As a result, AIB NI is not allowed to market or actively offer their full product suite to ROI residents. There are a limited set of circumstances in which we can continue to service existing customers (resident in ROI) that maintained accounts with us pre-Brexit to ensure that these customers are not unduly disadvantaged but unfortunately, we are not regulated or permitted to proactively offer new accounts to a new wider customer base.

3. Efforts made by the banks to support charities in their banking activity, including authentication, etc. of officers/trustees and ways that this process might be made easier

Customer Due Diligence is a critical component for the prevention of financial crime and is designed to ensure that we understand our customers and the nature of their business. Getting this right is important to mitigate risks such as money laundering and fraud.

However, we recognise that the application of this can present significant challenges for some customer groups, particularly smaller, volunteer led charity organisations. We are currently undertaking a review of our charity offering and associated processes.

Getting the balance right between robust due diligence and practical accessibility is important for us so that charities can open accounts smoothly while still meeting our legal and regulatory obligations.

4. The banks' appetite for risk with regard to investing in/lending to SMEs and micro businesses in NI

Supporting NI Businesses is a core priority for AIB NI. We recognise the vital role these organisations play in driving economic growth, innovation and local employment.

At AIB NI we have accessible local teams dedicated to supporting businesses with advice and help they need to grow. We are committed to ensuring that these businesses have access to appropriate and sustainable finance at every stage of their journey.

Yours sincerely



Brian Gillian
Head of Retail & AIB (NI)



AIB Group Excluded Activities List

In July 2020, AIB published our first list of Excluded Activities, an updated policy was approved by our Board in October 2020 and, since 29 January 2021, the Excluded Activities rules apply to all business customers with a Gross Connected Exposure of >£/€300k and who are relationship managed.

This list has since been incorporated into our Group Credit Risk Policy, which supports the management of credit risk across the Group. The policy rules now prohibit providing new money for term lending to businesses, or any of their subsidiaries, involved in the excluded business activities below.

Energy & Climate Action

- Exploration, extraction and upgrading of oil sands projects;
- Nuclear Power Generation;
- Nuclear waste transportation, decommissioning and/or final disposal of high-level nuclear waste;
- Coal or oil fired power generation (other than emergency or stand by oil generation) except where less than 25% of revenues are generated from this activity and only where there is a plan to move to sustainable fuels by 2025;
- Onshore/offshore exploration, extraction or refining of Coal or Oil;
- Natural Gas fracking;

Animal Welfare

- Producing, processing animal fur;
- Support of any type of animal fights for entertainment;
- The use of dynamite or poison to the catch marine and fresh water species (including shellfish) in the wild;

Ecosystem Protection

- Deforestation or the burning of natural ecosystems for the purposes of land clearance;
- Timber from illegal trading or logging operations;
- Production or trade in wood or other forestry products other than from sustainably managed forests;

Healthcare/Genetic Engineering

- The development of Genetic Engineering or Genetic Modification on humans;
- The development of Genetic Engineering or Genetic Modification on animals for non-medical purposes;

Adult Entertainment

- Online pornography;

Surveillance/Arms Related/Military

- Anti-personnel landmines¹/Cluster munitions²;
- Weapons of Mass Destruction including the production, maintenance or trade of nuclear, biological³, chemical⁴ and toxin weapons;
- Any activity that adversely impacts Human Rights defined by the UN⁵;

[1] As defined in Article 2 of the Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on their Destruction

[2] As defined in Article 2 of the Convention on Cluster Munitions

[3] As defined in Article I of the Convention on the Prohibition of the Development, Production and Stockpiling of Bacteriological (Biological) and Toxin Weapons and on their Destruction

[4] As defined in Article II of the Convention on the Prohibition of the Development, Production, Stockpiling and Use of Chemical Weapons and on their Destruction (Chemical Weapons Convention)

[5] As listed on the UN website: <https://www.un.org/en/universal-declaration-human-rights/>