

Gatehouse Bank - 2023 GRI Content Index

Statement of use	Gatehouse Bank has reported in accordance with the GRI Standards for the period 1 January 2023 to 31 December 2023.
GRI 1 used	GRI 1: Foundation 2021
GRI Sector Standard(s)	There are no GRI Sector Standards available for the financial services sector.

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION AND NOTES
General disclosures		
GRI 2: General Disclosures 2021	<i>2-1 Organizational details</i>	Gatehouse Bank Plc operates in the UK only and is headquartered at The Helicon, One South Place, London EC2M 2RB with offices in Wilmslow and Milton Keynes.
	<i>2-2 Entities included in the organization's sustainability reporting</i>	Sustainability reporting for Gatehouse Bank Plc includes its fully owned subsidiaries; Gatehouse Investment Management Limited (GIM) and Ascend Estates Limited. Website shows information for prior reporting periods https://www.gatehousebank.com/personal
	<i>2-3 Reporting period, frequency and contact point</i>	We report on sustainability and financial performance annually from 1 January to 31 December. This reporting periods covers 1 Jan 2023 to 31 Dec 2023. Our most recent report will be published before June 30 2024. For more information please contact sustainability@gatehousebank.com
	<i>2-4 Restatements of information</i>	No restatements made form pervious reporting periods.
	<i>2-5 External assurance</i>	Gatehouse Bank works with FBRH Consultants Ltd to independently assure the claims in this sustainability report. Prior to assurance, the report was overseen by a number of internal stakeholders including senior executives and the CEO, Charles Haresnape. The recent Sustainability Report is on our website https://www.gatehousebank.com/about-us/corporate-governance . The assurance statement is on page 28-29 of the Report.
	<i>2-6 Activities, value chain and other business relationships</i>	A) Financial services. B) Information unavailable. The information will be available in future reporting period.
	<i>2-7 Employees</i>	Gatehouse Bank Plc had 202 permanent employees based on headcount as at 31 December 2023. Comprised of 108 men and 94 women based out of our 3 offices with 75 in London, 85 in Milton Keyes and 36 Wilmslow and an additional 6 based at home. No significant fluctuations in the number of employees over the reporting period.
	<i>2-8 Workers who are not employees</i>	In 2023, Gatehouse Bank has no colleagues who are not employees.

GRI 2: General Disclosures 2021	2-9 Governance structure and composition	<p>Our Board of Directors is the primary governing body and has ultimate responsibility for setting the Bank's strategy, corporate objectives and risk appetite.</p> <p>The Bank's risk control and governance framework is approved and governed by the Board and managed on a day-to-day basis by the Board's delegated Committees and its Executive Committee. Our Shariah Supervisory Board is responsible for ensuring that the Bank's activities comply with Shariah law.</p> <p>While the Board maintains oversight of all areas relating to ESG, we also have a dedicated ESG steering group, chaired by the CEO, who provide direction and measure progress around ESG initiatives.</p> <p>For more information about our governance structure, please visit gatehousebank.com/about-us/corporate-governance. Further information unavailable. The information will be available in future reporting periods.</p>
	2-10 Nomination and selection of the highest governance body	<p>The nomination of a Board member is based on a recommendation of the Remuneration and Nominations Committee ("RNC") and approval by the Board. The RNC is responsible for reviewing the structure, size and composition of the Board and making recommendations to the Board, giving consideration to succession planning. The nomination process includes consideration of:</p> <ul style="list-style-type: none"> - the Regulators' Senior Management Function accountability requirements, where appointment is subject to securing and maintaining SMF status; - the relevance of the individual's qualifications, skills and experience to their proposed role; - their fitness and propriety to act as a director of the Bank; - the need to reflect the diversity of the Bank's customer base; - the individual's other roles and directorships and their ability to devote adequate time to their proposed role; and - the need to maintain a balanced representation of Board members. <p>2-10 b Further information unavailable. The information will be available in future reporting periods.</p>
	2-11 Chair of the highest governance body	Chair of the highest governance body has no executive function.
	2-12 Role of the highest governance body in overseeing the management of impacts	<p>While the Board maintains oversight of all areas relating to ESG, we also have a dedicated ESG steering group, chaired by the CEO, who provide direction and measure progress around ESG initiatives.</p> <p>Further information, aligning with the Sustainability Report, can be found under 'Corporate Governance Report' in our latest Annual Report on our website https://www.gatehousebank.com/about-us/corporate-governance.</p> <p>2-12 b-c further information unavailable. The information will be available in future reporting periods.</p>
	2-13 Delegation of responsibility for managing impacts	<p>While the Board maintains oversight of all areas relating to ESG, we also have a dedicated ESG steering group, chaired by the CEO, who provide direction and measure progress around ESG initiatives.</p> <p>Further information, aligning with the Sustainability Report, can be found under 'Corporate Governance Report' in our latest Annual Report on our website https://www.gatehousebank.com/about-us/corporate-governance.</p> <p>2-13 b further information unavailable. The information will be available in future reporting periods.</p>
	2-14 Role of the highest governance body in sustainability reporting	<p>While the Board maintains oversight of all areas relating to ESG, we also have a dedicated ESG steering group, chaired by the CEO, who provide direction and measure progress around ESG initiatives. Further information unavailable. The information will be available in future reporting periods.</p>

GRI 2: General Disclosures 2021	2-15 <i>Conflicts of interest</i>	<p>As per the Corporate Governance Framework No director will put themselves in a position where their interests conflict, or may be perceived to conflict, with those of the Company. Directors must not accept a benefit from a third party conferred by reason of:</p> <ul style="list-style-type: none"> • being a director; or • doing (or not doing) anything as a director. <p>Directors are required to notify the Company in advance of any potential conflicts through other directorships or shareholdings. If a conflict, or potential conflict, situation may arise, directors must seek authorisation from the Board, in accordance with the Articles of Association.</p> <p>If directors have any doubts about whether a conflict or potential conflict may arise, they should consult the Chairman in the case of non-executive directors, or the Chief Executive Officer in the case of executive directors, before doing anything that might compromise the Bank. It is advisable to take a conservative approach in this area and "over disclose" to stakeholders or related parties in the case of doubt.</p> <p>Any further information relating to 2-15 b) Further information unavailable. The information will be available in future reporting periods. Declaring Conflicts of Interest is a standing agenda item at every Board meeting and all or any are recorded in the minutes of the meeting. Potential conflict situations are disclosed to the Board and reviewed at least annually.</p>
	2-16 <i>Communication of critical concerns</i>	<p>The Board maintains sound risk management and internal control systems.</p> <p>The Board ensures the effectiveness of the Bank's risk management and internal control systems through the conduct of internal audit reviews.</p> <p>The internal audit reviews cover all material controls, including financial, operational and compliance controls.</p> <p>HR risks, including grievances raised by employees, are reported by the Chief People Office to the RNC which, in turn, reports any critical concerns to the Board.</p> <p>Operational Risk incidents are tracked and reported to the Board Risk and Compliance Committee as part of the Chief Risk Officer's report.</p>
	2-17 <i>Collective knowledge of the highest governance body</i>	<p>The Board maintains oversight of all areas relating to ESG. We also have a dedicated ESG steering group, chaired by the CEO, who provide direction and measure progress around ESG initiatives. Information is available in our most recent Annual Report on our website https://www.gatehousebank.com/about-us/corporate-governance. Additional information unavailable. The information will be available in our next reporting period.</p>
	2-18 <i>Evaluation of the performance of the highest governance body</i>	<p>Information is unavailable. The information will be available in future reporting periods.</p>
	2-19 <i>Remuneration policies</i>	<p>Information can be found under 'Remuneration and Nominations Committee in our latest Annual Report on our website https://www.gatehousebank.com/about-us/corporate-governance. Further information unavailable. The information, including our Remuneration Policy will be publicly available in future reporting periods.</p>
	2-20 <i>Process to determine remuneration</i>	<p>Information can be found under 'Remuneration and Nominations Committee in our latest Annual Report on our website https://www.gatehousebank.com/about-us/corporate-governance. Further information unavailable. The information, including our Remuneration Policy will be publicly available in future reporting periods.</p>

GRI 2: General Disclosures 2021	2-21 Annual total compensation ratio	Information is available in our 2023 Annual Report on pages 14-15, 27-28 & 118-119, on our website https://www.gatehousebank.com/about-us/corporate-governance . Additional information unavailable. The information will be available in our next reporting period.
	2-22 Statement on sustainable development strategy	A Statement from our CEO on page 2 of our Sustainability Report 2023.
	2-23 Policy commitments	<ul style="list-style-type: none"> •Reduce emissions of home finance portfolio from base year by 90% 2050*. •Track and disclose the average Energy Performance Certificate Rating of properties in the home finance portfolio. Further details available in our ESG Policy and Sustainable Procurement Policy on our website https://www.gatehousebank.com/about-us/corporate-governance . Additional information unavailable. The information will be available in our next reporting period.
	2-24 Embedding policy commitments	Not Applicable. Under UK we are not required to provide the information needed in 2-24 to embed policy commitments under UK law.
	2-25 Processes to remediate negative impacts	<p>The Bank has a Grievance and Disciplinary Policy, under which an employee may raise a formal grievance where informal attempts at resolution have failed. A formal grievance should be concerned with the way an employee believes they have been treated by the Bank or managers or other colleagues. Any grievance is investigated, including holding a meeting with the employee, and the employee is informed of the outcome in writing. The employee has a right of appeal if they are not satisfied with the outcome.</p> <p>In addition, the Bank operates a separate Whistleblowing Policy to enable employees to report illegal activities, wrongdoing, or malpractice. However, where an employee is directly affected by the matter in question, or feel they have been victimised for whistleblowing, they may raise concerns under Grievance and Disciplinary Policy. Complaints can be addressed by emailing info@gatehousebanksavings.com</p> <p>Please see pg. 47 of the Sustainability Report 2023.</p> <p>Both abovementioned policies are in place however not currently available on our website.</p> <p>2-25 e Additional information unavailable. The information will be available in our next reporting period.</p>
	2-26 Mechanisms for seeking advice and raising concerns	The Bank has a Whistleblowing Policy to enable employees to report illegal activities, wrongdoing, or malpractice. However, where an employee is directly affected by the matter in question, or feel they have been victimised for whistleblowing, they may raise concerns under Grievance and Disciplinary Policy.
	2-27 Compliance with laws and regulations	No significant incidences of non compliance and no fines relating to non-compliance during the reporting period.
	2-28 Membership associations	Our memberships and associations can be found on pages 50-53 of the Sustainability Report 2023.
	2-29 Approach to stakeholder engagement	Our approach can be found on page 8 of the Sustainability Report 2023.
	2-30 Collective bargaining agreements	Not applicable. There is no collective bargaining within Gatehouse Bank.
Material topics		
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Our process is described on page 6-7 of our Sustainability Report 2023.
	3-2 List of material topics	Details of our material topics can be found on page 6 of our Sustainability Report 2023.

Economic performance		
GRI 3: Material Topics 2021	3-3 Management of material topics	The management of material topics can be found on page 6-7, 23-26 of the Sustainability Report, 2023. Any additional information is unavailable at this time and will be available in future reporting periods.
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Information is unavailable at this time and will be available in future reporting periods.
	201-2 Financial implications, other risks/opportunities from climate change	Information is unavailable at this time and will be available in future reporting periods.
	201-3 Defined benefit plan obligations and retirement plans	Information is unavailable at this time and will be available in future reporting periods.
	201-4 Financial assistance received from government	Information is unavailable at this time and will be available in future reporting periods.
Procurement practices		
GRI 3: Material Topics 2021	3-3 Management of material topics	The management of material topics can be found on page 6-7, 18 of the Sustainability Report, 2023. Further information unavailable. The information will be available in future reporting periods.
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	We are a UK wide Bank and vast majority of our suppliers are based in the UK, refer to our Sustainable Procurement Policy for information. Further details unavailable. The information will be available in future reporting periods.
Anti-corruption		
GRI 3: Material Topics 2021	3-3 Management of material topics	<p>We operate a strict Anti-Money Laundering, Counter Terrorist Financing Policy (AML Policy) that complies with the requirements and obligations set out by UK legislation, regulations, rules and industry guidance for the financial services sector, which is overseen by our Money Laundering Reporting Officer. All of our Board Members, Executive Committee and colleagues completed Anti-Bribery and Anti-Money Laundering training in 2023.</p> <p>We have a risk-based approach towards assessing and managing money laundering and terrorist financing risks and risk-based Customer Due Diligence procedures.</p> <p>Our anti-corruption policies and procedures are approved by the governing body at least every two years (sooner if there is a change in policy) and every new joiner must read and attest to the policy as part of their induction process.</p> <p>We share our site terms of business with all our brokers regarding our Home Purchase Plans and BTL products, in line with the rules set out by the FCA to comply with the latest laws and regulations, including those on money laundering.</p> <p>3-3 d-f Further information unavailable. The information will be available in future reporting periods.</p>
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Across our entire operations, we operate a strict Anti-Money Laundering, Counter Terrorist Financing Policy (AML Policy) that complies with the requirements and obligations set out by UK legislation, regulations, rules and industry guidance for the financial services sector, which is overseen by our Money Laundering Reporting Officer. Further information unavailable. The information will be available in future reporting periods.

GRI 205: Anti-corruption 2016	<i>205-2 Communication and training about anti-corruption policies and procedures</i>	We operate a strict Anti-Money Laundering, Counter Terrorist Financing Policy (AML Policy) that complies with the requirements and obligations set out by UK legislation, regulations, rules and industry guidance for the financial services sector, which is overseen by our Money Laundering Reporting Officer. All of our Board Members, Executive Committee and employees completed Anti-Bribery and Anti-Money Laundering training in 2023. Our anti-corruption policies and procedures are approved by the governing body at least every two years (sooner if there is a change in policy) and every new joiner must read and attest to the policy as part of their induction process. Further information unavailable. The information will be available in future reporting periods.
	<i>205-3 Confirmed incidents of corruption and actions taken</i>	No incidents of fraud / financial crime were recorded in 2023.
Tax		
GRI 3: Material Topics 2021	<i>3-3 Management of material topics</i>	The management of material topics can be found on page 6-7, 25-26 of the Sustainability Report 2023. Any additional information is unavailable at this time and will be available in future reporting periods.
GRI 207: Tax 2019	<i>207-1 Approach to tax</i>	We elect to openly disclose our tax payments. More information can be found in our 2023 Sustainability Report pg. 25-26 and 2023 Annual Report pg. 72,84 & 90 on our website https://www.gatehousebank.com/about-us/corporate-governance . Further information unavailable. The information will be available in future reporting periods.
	<i>207-2 Tax governance, control, and risk management</i>	Information unavailable/ incomplete. The information will be available in future reporting periods.
	<i>207-3 Stakeholder engagement and concern management related to tax</i>	Information unavailable/ incomplete. The information will be available in future reporting periods.
	<i>207-4 Country-by-country reporting</i>	Gatehouse Bank is UK-based only and reports only in the UK. More information can be found in our 2023 Annual Report pg. 134-136 on our website https://www.gatehousebank.com/about-us/corporate-governance . Further information unavailable. The information will be available in future reporting periods.
Biodiversity		
GRI 3: Material Topics 2021	<i>3-3 Management of material topics</i>	See section on 'Managing Biodiversity with GIM' on page 20. Any additional information is unavailable at this time and will be reported in future reporting periods.
GRI 304: Biodiversity 2016	<i>304-2 Significant impacts of activities, products and services on biodiversity</i>	See section on 'Managing Biodiversity with GIM' on page 20. Any additional information is unavailable at this time and will be reported in future reporting periods.
Emissions		
GRI 3: Material Topics 2021	<i>3-3 Management of material topics</i>	See 'Environment' on pages 10-20. Any additional information is unavailable at this time and will be available in future reporting periods.
GRI 305: Emissions 2016	<i>305-1 Direct (Scope 1) GHG emissions</i>	See 'Operational Greenhouse Gas Emissions' and SECR Report from pages 11-12. Further information unavailable. The information will be available in future reporting periods.
	<i>305-2 Energy indirect (Scope 2) GHG emissions</i>	
	<i>305-3 Other indirect (Scope 3) GHG emissions</i>	
	<i>305-4 GHG emissions intensity</i>	
	<i>305-5 Reduction of GHG emissions</i>	

GRI 305: Emissions 2016	305-6 Emissions of ozone-depleting substances (ODS)	See 'Operational Greenhouse Gas Emissions' and SECR Report from pages 11-12. Further information unavailable. The information will be available in future reporting periods.
	305-7 Nitrogen oxides (NOx), sulphur oxides (SOx), and other air emissions	

Employment

GRI 3: Material Topics 2021	3-3 Management of material topics	The management of material topics can be found on page 38-44, "Our people and culture" of the Sustainability Report 2023. 3-3 d-f Any additional information is unavailable at this time and will be available in future reporting periods.
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GRI 401: Employment 2016	401-3 Parental leave	GRI No.	GRI Description	Female	Male
		401.3a	a. Total number of employees that were entitled to parental leave, by gender.	84	98
		401.3b	b. Total number of employees that took parental leave, by gender.	8	4
		401.3c	c. Total number of employees that returned to work in the reporting period after parental leave ended, by gender.	3	2
		401.3d	d. Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work, by gender.	3	2
		401.3e	e. Return to work and retention rates of employees that took parental leave, by gender.	100%	100%

Training and education

GRI 3: Material Topics 2021	3-3 Management of material topics	The management of material topics can be found under 'Creating opportunities for training and development' on page 40 of the Sustainability Report 2023. 3-3 d-f Any additional information is unavailable at this time and will be available in future reporting periods.
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GRI 404: Training and Education 2016	404-2 Programs for upgrading employee skills and transition assistance programs	We have induction courses, personal development plans, individual/group training and management development plans. See 'Creating opportunities for training and development' on page 40 of our Sustainability Report, 2023.
	404-3 Percentage of employees receiving regular performance and career development reviews	All employees receive regular performance and career development reviews as part of Gatehouse Bank employee development.

Diversity and equal opportunity

GRI 3: Material Topics 2021	3-3 Management of material topics	See 'Diversity, Equity and Inclusion' on page 42-44. Any additional information is unavailable at this time and will be available in future reporting periods.
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GRI 405: Diversity and Equal Opportunity 2016	405-2 Ratio of basic salary and remuneration of women to men	London	M:F Ratio	See 'Closing the Pay Gap' on pg. 23-24 of Sustainability Report 2023. London and Milton Keynes locations chosen as they account for 80% of headcount. As of 31st December 2023, we have calculated a 32% mean and 23% median gender pay gap between men and women who work at Gatehouse Bank. The primary reason for our gender pay gap is due to more men holding Executive-level positions, whilst women tend to work in lower quartiles, which is consistent with trends observed in the wider industry. More information can be found in our Annual Report 2023 pg. 27-28. 405-2 b Further information unavailable. The information will be available in future reporting periods.
		Permanent	1:0.7	
		Milton Keynes	M:F Ratio	
		Permanent	1:0.6	
Non-discrimination				
GRI 3: Material Topics 2021	3-3 Management of material topics	See 'Diversity, Equity and Inclusion' on page 42-44.		
GRI 406: Non-discrimination 2016		Any additional information is unavailable at this time and will be available in future reporting periods.		
		There were no incidents of discrimination and corrective actions taken.		
Customer privacy				
GRI 3: Material Topics 2021	3-3 Management of material topics	See 'Customer Privacy' on page 32. Any additional information is unavailable at this time and will be available in future reporting periods.		
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy	In 2023, we recorded one substantiated complaint concerning a breach of customer privacy, which was resolved and closed, which is not related to previous reporting periods.		
Community				
GRI 3: Material Topics 2021	3-3 Management of material topics	See 'Gatehouse and Society' for more information. In particular, we help facilitate access to housing and finance, see page 28-36 of the Sustainability Report 2023 for more information. The management of material topics can be found on page 6-7 of the Sustainability Report 2023. Any additional information is unavailable at this time and will be available in future reporting periods.		