

Modern Slavery Statement

This modern slavery statement by Bank ABC Group covers forced labour and child labour. Bank ABC Group adopts a zero-tolerance approach to modern slavery across its value chain, including its workforce, operations, supply chain and customer base.

Organisational structure

Bank ABC is a global Bank, with over 5,000 employees offering financial services to clients across 5 continents and 15 countries, as outlined in its annual Group Sustainability Disclosures Report. The Bank has a large MENA presence and is primarily a commercial and corporate Bank. The Bank also offers retail banking and Islamic banking in select countries, and other financial services such as capital markets and treasury. The Bank is highly diversified, operating in over 40 different sectors with a significant portion of business directed toward financial institutions, sovereign entities, and is broadly known for its global trade finance capabilities.

The Bank's supply chain is complex, providing goods and services to all Bank ABC locations with goods originating from all over the world. Goods and services are sourced via the Bank's respective local procurement teams within corporate services. The Bank has a Vendor Code of Conduct (CoC) as part of its suite of Policy documents reviewed and approved at Board level. The Vendor CoC is uniformly adopted as a baseline across all locations and includes a section explicitly addressing modern slavery.

The Bank's supply chain is primarily focused on providers of professional services and IT services. This includes access to third party data management platforms, ratings agencies and cloud-based architecture. The Bank's supply chain also involves the procurement of goods and services to support the core banking activities.

The Bank undertakes regular ESG-related horizon scanning across its jurisdictions, which includes modern slavery and forced labour-related horizon scanning, to ensure it is compliant with all relevant legislative expectations. It also undertakes regular reviews to evaluate risks associated with its supply chain including but not limited to safety, human trafficking, child labour and other legal requirements. The Bank's collective knowledge concerning modern slavery across its operations and supply chain continues to develop in line with evolving regulatory expectations.

Policies

The Bank operates with an Employee Code of Conduct and a Vendor Code of Conduct across its jurisdictions, the latter of which addresses modern slavery. It undertakes modern slavery disclosures in regions where required, such as for its operations in the UK. The latest iteration of the ABCIB's UK modern slavery statement can be found on their website.

The Bank has further documents covering related areas such as a Human Rights Positioning Statement, aligned with industry practice and explicitly addressing leading standards such as the UN Guiding Principles, OECD Due Diligence Guidance for Responsible Business Practice, ILO Labour Standards and UN Universal Declaration on Human Rights.

The Modern Slavery Statement has been developed in conjunction with relevant stakeholders, including the Group Corporates Services function, Compliance, Wholesale banking, HR and Group Communications, along with individual branches and subsidiaries across various locations.

This inaugural statement is located publicly online, and maintained internally via the Bank's Policies, Standards and Procedures database. It is circulated to relevant stakeholders with processes and monitoring arrangements to be developed to ensure compliance. The Bank may amend its modern slavery approach from time to time to ensure compliance with evolving regulatory expectations.

Risk management

The Bank is building its modern slavery assessment procedures to align with industry practice. The approach will involve a combination of desk-based research, due diligence of both suppliers and customers, stakeholder engagement and completion of questionnaires via the Bank's Client ESG Risk Assessment template.

The highest priority modern slavery risk relates to goods and services coming from developing nations with limited governance controls, mechanisms for monitoring combined with high levels of poverty and low education.

Due diligence

Suppliers must adhere to Bank ABC's Vendor Code of Conduct, which includes elements relating to preventing and eradicating modern slavery. For clients, the Bank includes adverse screening (including supply chain) questions as part of its Client ESG Risk Assessment questionnaire, with negative responses automatically triggering enhanced due diligence. This applies to new credit facilities, increases, extensions and annual reviews for customers in sectors with elevated risk.

Remediation processes are detailed in Bank ABC's Human Rights Positioning Statement. This includes undertaking stakeholder engagement as necessary and may ultimately result in the termination of relationships in situations where remedial actions are deemed ineffective.

Training

Bank ABC maintains a confidential whistleblower's process to ensure employees feel comfortable raising concerns relating to conduct-related issues or broader issues. Employees are encouraged to raise concerns, protected against retaliation and must complete annual whistleblowing training in addition to annual Code of Conduct training.



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