

Annual Policy statement on Anti-Slavery and Human Trafficking as at 31st December 2018

INTRODUCTION FROM THE CHAIRMAN

Slavery and human trafficking is unacceptable. We all have a responsibility to be alert to the risks in our business and in the wider supply chain. At Ahli United Bank (UK) PLC (the “Bank”), we are committed to playing our role in the global response to modern slavery, ensuring that we pay our employees more than the legal minimum wage and that we maintain and enforce proportionate systems and controls to ensure slavery and human trafficking does not take place in our supply chain.

ORGANISATION STRUCTURE

The Bank is a UK incorporated bank, based solely in the UK, and is a wholly owned subsidiary of Ahli United Bank BSC. We are authorised to operate in the UK by the PRA and are regulated by the PRA and FCA. As part of operating a successful business, we seek to ensure that we comply with all relevant laws and regulations.

STATEMENT OF COMPLIANCE – MODERN SLAVERY & TRANSPARENCY IN THE SUPPLY CHAIN

This statement is made in compliance with the Modern Slavery Act 2015 and sets out the steps we have taken during the last financial year to ensure that slavery and human trafficking is not taking place in any part of our supply chain or our business.

POLICIES AND TRAINING WITHIN THE WHOLE ORGANISATION:

The Bank is committed to ensuring there is no modern slavery in our supply chains or any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our business or within our suppliers.

Whilst we consider there to be a low risk of modern slavery in our business, to promote an understanding of the risks of slavery and human trafficking in our suppliers, we provide awareness training to all relevant members of staff upon joining and at least annually thereafter. .

The Bank has also produced a separate set of Anti-Slavery Procedures to provide further guidance to staff.

SUPPLY CHAIN MANAGEMENT AND DUE DILIGENCE PROCESSES

The Bank offers a broad range of financial services to our customers. In order to provide these services we procure a range of goods and services from third party suppliers, mainly from the UK who may, in turn, enter into sub-contracts with their suppliers. We may also, from time to time, outsource some of our back office functions to suppliers.

We have a zero tolerance to slavery and human trafficking and we work together with those in our supply chain to comply with our values.

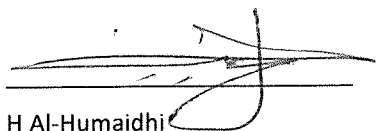
The Bank is in the process of reviewing its supply chain of all third party contracts using a risk based approach to ensure compliance with the Anti-Slavery Policy. There is an increased awareness of Modern Slavery in the Bank’s outsourcing framework documentation. As part of our initiative to identify and mitigate risk, the Bank has utilised the International Anti-Slavery index as a means to categorise countries into risk sectors and tailor the Bank’s approach accordingly. A review of critically outsourced contracts has been completed and relevant management information will be produced, setting out relevant contractual conditions and reports of possible wrongdoings, prioritising those contacts that are identified as high risk locations as set out in the Bank’s Anti-Slavery Procedures.

Our Head of Legal is responsible for overseeing the implementation of our Anti-Slavery Policy and the annual preparation of our statement.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

To date we have not discovered any violations of our Anti-Slavery Policy. If there are any violations we will respond proportionately to the nature and extent of the violation. Serious violations will require immediate and decisive action and may result in the termination of the business relationship.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the current financial year.


 H Al-Humaidhi

Chairman