

## **AHLI UNITED BANK (UK) PLC**

### **Annual Statement on Anti-Slavery and Human Trafficking as at 31 December 2022**

#### **Introduction from the Chairman**

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 (**Bank**), we are committed to playing our role in the global response to modern slavery. This includes maintaining and enforcing proportionate systems and controls to seek to ensure that slavery and human trafficking does not take place in our organisation or supply chains and that we pay our employees more than the legal minimum wage.

#### **Organisational structure and supply chains**

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 United Kingdom (**UK**) by the Prudential Regulation Authority (**PRA**) and are regulated by the PRA and the Financial Conduct Authority. As part of operating a successful business, we seek to ensure that we comply with all relevant laws and regulations.

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 third parties.

Slavery and human trafficking is unacceptable. We have a zero-tolerance approach to slavery and human trafficking and we work together with those in our supply chain to comply with our values. We have reviewed our operating model, systems and procedures to combat modern slavery and reduce the inherent risks focusing on how we undertake work.

We ensure that all our staff have a voice and are given opportunities to speak out (including anonymously), and know who to report to if they have concerns or witness exploitation in any part of our supply chains.

#### **Policies within the organisation**

The Bank is committed to taking action to seek to prevent 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 our business relationships and enforcing effective systems and controls to seek to ensure slavery and human trafficking is not taking place in our business or within our suppliers.

The Bank has produced a separate Anti-Slavery Policy to provide further guidance to staff and this is updated periodically.

When recruiting staff we adhere to our recruitment policies which dictate how we source staff and who we use.

All staff are required to undergo mandatory training on commencement of employment. This includes a module dedicated to modern slavery, which should be completed by staff within the first two weeks of employment. Modules are retaken by staff annually. Department heads are responsible for ensuring staff complete and pass the modules.

The module includes information on anti-slavery laws, and provides an insight into which sectors are most at risk of employing staff who may be subjected to modern slavery. There are multiple case studies comprised in the module to further demonstrate the repercussions for companies which breach modern slavery legislation.

## **Due Diligence**

The Bank continues to review its supply chain of all third-party contracts using a risk-based approach to ensure compliance with the Bank's Anti-Slavery Policy.

The Bank increasingly addresses the risk of modern slavery in the Bank's outsourcing framework documentation and continues to take action in respect of its obligations to prevent modern slavery. The Bank carries out diligence on all suppliers and is in the process of updating its commercial contracts with counterparties to address compliance with anti-modern slavery laws and to implement contractual protections relating to the prevention of modern slavery.

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.

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

It is incumbent on staff to conduct due diligence checks on all workers, agencies, suppliers and third parties before engagement.

We encourage, and expect, all staff to raise awareness of modern slavery and human trafficking among our suppliers and third parties. Our staff are to conduct enhanced due diligence on any supplier who is suspected or at high risk of using forced labour. Staff are made aware that all their concerns must be reported to their line manager or via our whistleblowing hotline.

## **Training**

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.

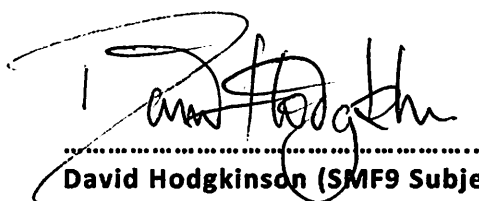
## **Our Effectiveness**

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.

## **Statement of Compliance**

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 financial year ending 31 December 2022.

This statement was approved by the Board of Directors of the Bank on 09 February 2023.



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**David Hodgkinson (SMF9 Subject to regulatory approval)**  
**Chairman and Director**