

## Slavery and Human Trafficking Statement – year ending 31st December 2016

#### **Introduction**

This is a slavery and human trafficking statement by ABC International Bank Plc ("Bank ABC").

The Modern Slavery Act 2015 makes it a crime to subject people to slavery, servitude, forced or compulsory labour, or human trafficking ("modern slavery").

The nature of our business means there is a low risk of us becoming involved in modern slavery, but we recognise the need for us to take appropriate measures to keep our business and supply chains free from this crime.

## **Our Business Structure**

Bank ABC is registered in England and is a wholly-owned subsidiary of Arab Banking Corporation, B.S.C., a bank based in Bahrain. The main services we offer are trade finance, treasury services and Islamic financial services.

We have approximately 250 staff across our head office in London, our branches in France, Germany and Italy, and our representative offices in Russia, Sweden and Turkey.

Our supply chain covers a range of products and services including information technology equipment and services, insurance, building maintenance, security, cleaning and catering.

### What we do in relation to our Staff and Supply Chain

We undertake a variety of checks when hiring new staff for our and their protection and in order to comply with the law. These include document checks, providing contracts of employment and ensuring everyone is aged 16 and above. We also pay our staff appropriate market salaries and rewards, plus other benefits including health and welfare options. We have a whistleblowing policy and independent hotline in place under which our staff are encouraged to report any knowledge or suspicion about criminal activity or other wrongdoing.

We pay our suppliers appropriate market rates. We will develop further procedures to reduce the risk of having suppliers who are involved in modern slavery. We will end our relationship with any supplier we identify as being involved in modern slavery.

### **Risk Assessment**

We see the risk of our employing victims of modern slavery as low. The greater risk is in our supply chain, where we do not have direct management control.

Of our main suppliers, most do business in the UK and or Europe, or offer low-risk products or services. Some suppliers are located in higher-risk countries or offer higher-risk services such as security, cleaning and catering. While we will make all our suppliers aware of our zero tolerance of modern slavery, we intend to focus most of our due diligence on the higher-risk suppliers.

# **Training, Awareness and Development**

We aim to provide training to staff involved in recruitment and procurement to help them reduce the risks of modern slavery in our business and supply chain. We will also make our staff aware of the existence and consequences of modern slavery, that we expect them to have no part in it, and that they should report any knowledge or suspicion of modern slavery through our whistleblowing procedure. We will continue to enhance relevant policies and procedures to better manage and reduce modern slavery risks.

Paul Jennings, Managing Director & Chief Executive Officer 27 June 2017