ABC INTERNATIONAL BANK PLC
("BANK ABC" OR WE)

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT – YEAR ENDING 31ST DECEMBER 2025

1. Introduction

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

This statement sets out the steps taken by Bank ABC to seek to prevent modern slavery during the year ending 31 December 2025.

Bank ABC adopts a zero- tolerance approach to involvement in modern slavery.

Whilst the nature of Bank ABC's business means that there is a low risk of becoming involved in modern slavery, Bank ABC takes measures to ensure that neither we nor any of our suppliers subject anyone to modern slavery. We will terminate our relationship with any supplier that we identify as being involved in modern slavery.

2. Bank ABC's 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. We offer trade finance, real estate finance, Islamic financial services, and treasury services. Bank ABC is authorised by the Prudential Regulation Authority (the "PRA") and dual regulated by the PRA and the Financial Conduct Authority (the "FCA").

3. Bank ABC's Values

Bank ABC's values are set out in our Code of Conduct, which is reviewed annually. Our "Values Framework" defines the Bank's core values which are:

- To be client centric;
- To be collaborative; and
- To be consistent.

Our "Values Framework" also sets out the associated "value drivers" and expected behaviours. Our commitment to integrity is paramount. By fostering a culture of honesty and transparency, we seek to ensure that our business practices are ethical and that we are vigilant in identifying and preventing any forms of modern slavery within our operations and supply chain.

4. Bank ABC's Staff

At the date of this statement, we have approximately 365 staff across our head office in London, our representative office in Turkey, and our subsidiary, Arab Banking Corporation SA, in Paris (which also has branches in Milan and Frankfurt).

When hiring staff we only make use of reputable recruitment agencies, who provide the necessary assurances and checks on candidates. We further undertake our own due diligence, including document checks and ensuring candidates are aged 16 or above. We pay our staff competitive market salaries and rewards, plus other benefits including health, welfare, and pension options.

All staff are subject to on-going continuous monitoring and are required to complete an annual attestation.

5. Bank ABC's Supply Chain

Our supply chain covers a range of products and services including information technology equipment and services, insurance, building maintenance, security, cleaning and catering. In the year-ending 2025 we identified that we engaged with 399 suppliers. Of these, 83% were suppliers based in the UK and/or the EU. The remaining 17% were outsourced to our head office in Bahrain.

We recognise our responsibility to ensure that our suppliers have fair and ethical labour practices. These are set out on the Bank's Outsourcing and Non-Outsourcing Policy and the Vendor Code of Conduct, each of which are updated annually. The Vendor Code of Conduct sets out the wide range of expectations that we have of our suppliers, including compliance with all applicable laws, statutes, regulations and codes in force relating to, amongst other things, modern slavery.

The Bank has on-going procedures in place to undertake "Know your Vendor" due diligence in relation to all suppliers to seek to ensure that the meet the requirements set out in Bank ABC's Vendor Code of Conduct. This process includes the screening of all local Vendors within the SmartSearch platform and the screening of all local and Group Shared Services Vendors within LSEG World Check One (this platform also checks against local group watch lists). Material suppliers are also asked to attest that they comply with our Vendor Code of Conduct (which makes express reference to the obligations set out in the Modern Slavery Act 2015) and, UK based vendors are required to provide us with a copy of their current modern slavery statement.

6. Customer KYC

Bank ABC employs a dedicated KYC on-boarding team who review all customers at the point of on-boarding and at regular intervals thereafter. Bank ABC's procedures include an explicit requirement to screen all customers and related parties for any adverse media pertaining to modern slavery.

7. Training, Awareness and Development

Bank ABC places significant importance on ensuring that all staff are equipped to recognise and prevent the risks of modern slavery. We deliver a comprehensive annual training programme in which modern slavery is a core component of our mandatory Financial Crime training for all staff. In addition, we provide targeted guidance and bespoke training to staff involved in procurement, enabling them to identify potential risks within our operations and supply chain and to take appropriate mitigating actions.

Bank ABC is committed to conducting its business with honesty and integrity and expects all staff to maintain high standards at all times. Our reputation and organisational integrity are essential to operating successfully and in full compliance within the financial services sector. Our Code of Conduct and Employee Whistleblowing Policy require and encourage staff to report any knowledge or suspicion of criminal activity or other wrongdoing, including modern slavery, to Senior Management or through our whistleblowing procedure. These mechanisms provide a secure and, where required, anonymous framework for reporting concerns.

In accordance with the Senior Managers and Certified Persons Regime ("SM&CR"), Bank ABC has appointed the Chair of the Audit Committee as the whistleblowers' champion, who may also be contacted should staff` have any concerns.

8. Risk Assessment

During the period to 31 January 2026 we performed a further review of our supply and outsourcing arrangements, which included an assessment of related modern slavery risks. We still consider our risk of directly employing victims of modern slavery as low however we are committed to ensuring that our supply chain is free from these practices. As indicated above, of our main suppliers, most do business in the UK or Europe, or offer low-risk products or services. All suppliers are consistently screened in line with our ongoing due diligence procedures.

Some suppliers are located in higher-risk countries or offer higher-risk services such as security, cleaning and catering. As part of our annual review of suppliers, which ensures effective monitoring of our business and supply chains to verify that they are free of modern slavery, we also collate and review the Modern slavery statements of our suppliers (where applicable).

This statement has been approved by the Board of Directors and is signed by the Chief Executive Officer & Managing Director.

Rajeev Adrian

Chief Executive Officer & Managing Director,

ABC International Bank PLC