



# **Barclays PLC**

Group Statement on Modern Slavery  
February 2023



## Introduction

Our success is judged not only by commercial performance, but also by our contribution to society and in the way we deploy finance responsibly to support people and businesses, acting with empathy and integrity, championing innovation and sustainability for the common good and the long term.

We believe that we can, and should, make a positive difference for society – globally and locally. We do that through the choices we make about how we run our business in light of all relevant risk and other factors and through the commitments we make to support our clients and communities and to champion sustainability for the long term. We recognise that we are at our best when our clients, customers, communities and colleagues all progress.

Modern slavery – which includes trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services – represents one of the gravest and most pervasive forms of human rights abuse in our society. The latest global estimates indicate that approximately 50 million people were living in conditions of forced labour or forced marriage alone in 2021<sup>a</sup>.

We recognise that the nature of our business and global footprint means we may be exposed to these risks across our operations, supply chain, and customer and client relationships. We do not tolerate any form of modern slavery and are committed to trying to identify and seeking to address human rights risks, such as modern slavery, across our value chain.

In this Statement<sup>b</sup> we report the progress we have made over the course of the year and outline our plans for the year ahead. Further information on our broader approach to managing environmental and social risks can be found in our Annual Report 2022.

 [Link to 2022 Barclays PLC Annual Report](https://home.barclays/annualreport)  
home.barclays/annualreport

### Notes

- a International Labour Organization (ILO), Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, available at [ilo.org/wcmsp5/groups/public/---ed\\_norm/---ipec/documents/publication/wcms\\_854733.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---ipec/documents/publication/wcms_854733.pdf)
- b This Statement is a joint statement made according to the requirements of section 54 of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth) for the financial year ending 31 December 2022. This is our seventh UK Statement and third Australian Statement. This Statement applies to all companies within the Barclays group that are required to produce a statement as listed in the Appendix. In this Statement, a reference to 'Barclays', 'Group', 'we' and 'our' includes Barclays Capital Asia Limited and Barclays Bank PLC under the Australian Modern Slavery Act 2018 (Cth).

## Our business and supply chain

As a British universal bank, we support individuals and small businesses through our consumer banking services, and larger businesses and institutions through our corporate and investment banking services.

### Our business

#### Serving the financial needs of our diversified customer base ...

Due to our wide range of products and services across markets, we define ourselves as a 'universal bank'.

##### Moving

We facilitate transactions and move money around the world.

##### Lending

We lend to customers and clients to support their needs.

##### Connecting

We connect companies seeking funding with the financial markets.

##### Protecting

We ensure the assets of our clients and customers are safe.

##### Investing and advising

We help our customers and clients invest assets to drive growth.

### Our company structure

#### Barclays UK

##### UK retail and business banking

Helping customers with their day-to-day banking needs and business services for clients from high growth start-ups to small and medium enterprises (SMEs).

#### Barclays International

##### Consumer, Cards and Payments

Offering credit cards and retail products outside of the UK, a global private bank, and enabling businesses around the world to make and receive payments.

##### Corporate and Investment Bank

Aiding money managers, financial institutions, governments, supranational organisations and corporate clients to manage their funding, financing, strategic and risk management needs.

#### Barclays Execution Services

Barclays Execution Services (BX) is the Group-wide service company providing technology, operations and functional services to businesses across the Group.

## Our business and supply chain (continued)

### Our company structure

Barclays operates as two divisions, Barclays UK and Barclays International, supported by our service company, Barclays Execution Services. Our ultimate parent company, Barclays PLC is incorporated in England and listed on the London Stock Exchange.

Barclays UK consists of our UK Personal Banking, UK Business Banking and Barclaycard Consumer UK business. These businesses are carried on by our UK ring-fenced bank (Barclays Bank UK PLC) and certain other entities within the Barclays Group.

Barclays International consists of our Corporate and Investment Bank and Consumer, Cards and Payments businesses. These businesses operate within our non-ringfenced bank (Barclays Bank PLC) and its subsidiaries, and certain other entities within the Group. Barclays Bank PLC has a physical presence in 25 countries<sup>c</sup>, with its registered office in London, UK.

Barclays Execution Services is the Group-wide service company providing technology, operations and functional services to business across the Group.

Barclays adopts a group-wide approach to addressing modern slavery risks in its operations and value chain, which includes the adoption of relevant group-level policies and due diligence procedures, which are described on pages 5-8. There are several subsidiary companies of Barclays PLC that meet the threshold of 'reporting entities' required to have a modern slavery statement under the UK Modern Slavery Act 2015 or the Australian Modern Slavery Act 2018 (Cth) (Australian Act), which are listed in the Appendix. This Statement is a joint statement made by Barclays PLC on behalf of itself and those reporting entities.

We report on Barclays Bank PLC and our Asia Pacific subsidiary Barclays Capital Asia Ltd in compliance with the Australian Act. The Barclays Group Sustainability & ESG team consulted with both the local management of Barclays Bank PLC (Australia branch) and Barclays Capital Asia Ltd in the preparation of this Statement.

Barclays Bank PLC currently engages in limited wholesale activities in Australia with its foreign company registration and licensing exemption granted by the Australian Securities and Investments Commission (ASIC), and with authorisation from the Australian Prudential Regulation Authority as a foreign bank.

The Corporate and Investment Bank of Barclays Bank PLC generally only deals with wholesale based, corporate clients in the Asia Pacific region (including Australia), mainly providing corporate and investment banking services, markets and research products. It will be extending its services to provide deposits in addition to its corporate lending products. Its supply chain risks are centrally managed by the Group global procurement function in line with the Group-level Third Party Service Provider Policy and associated standards.

Barclays Capital Asia Ltd is incorporated in Hong Kong and provides various financial services including securities advisory and trading services under its licence by the Securities and Futures Commission of Hong Kong. It also engages in limited wholesale activities in Australia with its foreign company registration and licensing exemption granted by ASIC.

Barclays Capital Asia Ltd only deals with wholesale based, corporate clients in both Hong Kong and Australia. Its supply chain risks are centrally managed by the Group global procurement function in line with the Group-level Third Party Service Provider Policy and associated standards.

### Notes

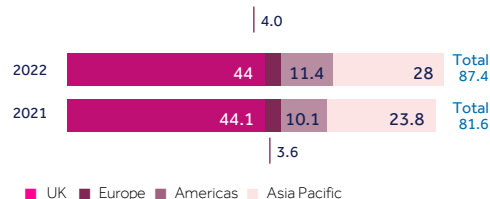
- <sup>c</sup> Barclays Bank PLC has a physical presence in the following countries: Australia, Canada, Cayman Islands, Chile, China, Colombia, France, Germany, Guernsey, India, Ireland, Isle of Man, Israel, Italy, Japan, Jersey, Monaco, Qatar, Singapore, South Africa, Switzerland, Turkey, United Arab Emirates, UK, US.

## Our business and supply chain (continued)

### Our people

As of 31 December 2022, we have 87,400 Barclays employees operating primarily in the UK, the Americas and the Asia Pacific region.

#### Number of employees split by region (000s)



Of the 28,000 staff employed in the Asia Pacific Region, around 1,746 are employed by Barclays Bank PLC (excluding managed services staff employed by other group related entities) including around 540 permanent staff employed by Barclays Capital Asia Ltd in Hong Kong and Australia.

Paying at least a living wage to all our colleagues is at the heart of our Fair Pay agenda. In the UK, our minimum rate of pay is moving to £12.23 per hour from 1 March 2023, 12% above the 2023 Real Living Wage set by the Living Wage Foundation.

This is part of the 2023 pay deal for c.41,000 employees with a total average salary increase budget of 11% for our lowest-paid colleagues. In addition, our minimum starting salary will increase to £22,250 from 1 March 2023, an increase of more than 33% in four years.

In the US, we reviewed the pay of our lowest paid colleagues resulting in a wage increase budget of 9%. From March 2023, colleagues will be paid at least \$22.50 per hour. In India, our lowest paid colleagues will receive an average increase of 10% from March 2023. In all other locations, we continue to exceed the benchmarks set by the Fair Wage Network for each country.

**+** For further information, see Barclays PLC Fair Pay Report 2022 found at: [home.barclays/annualreport](https://home.barclays/annualreport)

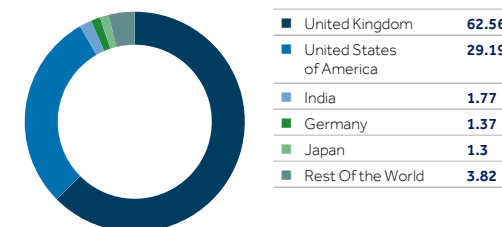
### Our supply chain

Though our businesses are geographically diverse, more than 90% of our third-party spend is concentrated in the UK and US, our two home markets. Our supply base is diverse in scale, ownership-type and structure – from privately-held start-ups to publicly-listed multinational corporations.

Those with whom we contract directly, also known as first-tier suppliers, generally fall into one or more of the following categories: Corporate Real Estate and related services, Technology Infrastructure, Software & Services, Banking Operations, Professional Services, Marketing and Human Resources. Given that many of our first-tier suppliers have their own extensive supply chains, by extension we connect to thousands more businesses and employees worldwide.

We have a Supplier Diversity framework that supports utilisation of diverse suppliers at the first and second tier, including communicating expectations to our first-tier suppliers that we expect them to use diverse suppliers as second-tier suppliers (subcontractors). We define diverse suppliers as either size diverse or ownership diverse.

### Supplier spend per country (%)<sup>d</sup>



#### Notes

<sup>d</sup> This chart represents the countries in which the goods and services are delivered.

# Identifying, assessing and addressing modern slavery risks

## Our policies on modern slavery

Barclays is committed to operating in accordance with the International Bill of Human Rights and takes account of other internationally accepted human rights standards, including the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD Guidelines). We take steps to respect human rights in our own operations through our employment policies, in our supply chain through screening and engagement, and through the responsible provision of our products and services.

We seek to embed our commitment into the following policies and statements, which support our approach to identifying, assessing and addressing modern slavery risks:

- Our Barclays Statement on Human Rights, which outlines Barclays' approach to respecting human rights across our business operations, supply chain activities, interactions with local communities and provision of products and services for clients and customers.
- Our Code of Conduct 'The Barclays Way', which outlines the Purpose, Values and Mindset that govern our way of working across our business globally and reiterates how Barclays respects human rights.
- Our Third Party Code of Conduct (TPCoC), which outlines the standards that we expect our third parties to adhere to, including on human rights and modern slavery-related issues.

- Our people policies are designed to provide equal opportunities and to create an inclusive culture, in line with our values and in support of our long-term success. They also reflect relevant employment law, including the provisions of the Universal Declaration of Human Rights and International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.
- Our Financial Crime Compliance Statement, which covers our approach to anti-bribery and corruption, anti-money laundering, anti-tax evasion facilitation and sanctions. It sets out the minimum control requirements designed to support all Barclays businesses and legal entities to comply with the requirements and obligations set out in relevant legislation, regulations, rules and industry guidance for the financial services sector. This includes the requirement to have adequate systems and controls in place to mitigate the risk of the firm being used to facilitate financial crime. This Statement is relevant because modern slavery offences are often linked to money laundering and other financial crimes.

## Raising concerns

It is important that Barclays maintains a culture where anyone feels they can speak up if they believe that something is not right. A colleague survey indicated that a significant majority of our employees feel it is safe to do so. Most colleagues feel comfortable raising concerns directly to their management, Compliance, Legal or HR. However, where individuals do not feel comfortable using these channels they can contact the Barclays Raising Concerns Team.

The Raising Concerns Team receive, assess, and refer concerns (including those relating to potential modern slavery and whistleblowing) to the most appropriate team for review and possible investigation. All matters raised through the Raising Concerns process are treated seriously and all concerns are managed sensitively and confidentially. Raising Concerns reporting channels are also available externally, via Barclays' public website.

Whistleblowing is a core element of raising concerns at Barclays. Whistleblowing relates to concerns which fall into the wider public interest, such as a breach of our policies and procedures, breaches of law and regulation, and behaviour that harms or is likely to harm the reputation or financial wellbeing of Barclays. We take all whistleblowing reports extremely seriously and have a zero-tolerance approach to retaliation against any whistleblower or any individual who has provided information as part of an investigation.

### During 2022:

- No substantiated incidents related to modern slavery concerns were raised through our Raising Concerns reporting channels.

## Governance

The Barclays PLC Board receives regular updates on public policy and corporate responsibility matters, including ESG and Reputation risk. The Board is presented with the Group Reputation Risk Report twice a year in order to consider the most significant live and emerging Reputation risks for the Group, which may cover human rights matters. In addition, the Board may be notified, or asked to consider, specific Reputation risk matters from across the Group, aligned with the escalation protocols set out in the Reputation Risk Management Framework.

At an operational level, we have a cross-functional modern slavery working group to share updates and insights on the topic and work collectively on specific cases, as required. The working group includes stakeholders from across Barclays, with representatives from our Financial Crime, Procurement, Legal and Sustainability & ESG functions.

# Identifying, assessing and addressing modern slavery risks (continued)

## Identification and Assessment Suppliers

Barclays is committed to trying to identify and seeking to address the modern slavery risks that we may be linked to through our supplier relationships. We assess our supply chain for modern slavery risks using the SEDEX<sup>®</sup> RADAR risk methodology which considers factors such as country risk, sector and category risk and spend. This risk methodology is informed by independent research as well as existing sources of information such as the ILO, Global Slavery Index, Kepler Cheuvreux and the US Bureau of Labor Statistics. Through the risk assessment we have identified the following areas as presenting an elevated risk of modern slavery in our supply chain:

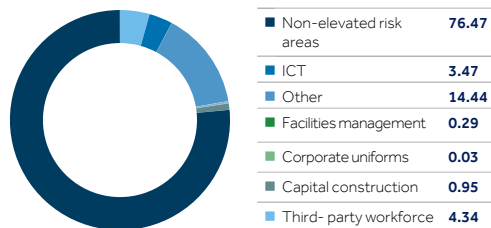
- Facilities management services provided on our properties, including cleaning and catering;
- Manufacture of ICT equipment used in our offices and retail branches;
- Manufacture of corporate uniforms used by our staff;
- Construction of our properties, and related construction services; and
- Staff working for Barclays through a third party.

These areas share common risk factors identified through the risk assessment: (i) the goods may be sourced from, or services provided in, certain countries with a higher estimated prevalence of modern slavery, and (ii) a higher likelihood that unskilled, low skilled or vulnerable groups are involved in supplying these goods or services.

### Notes

e SEDEX is one of world’s leading organisations supporting companies in effective identification, management and monitoring of modern slavery and human rights concerns in their supply chains. More information is available at: [www.sedex.com](http://www.sedex.com)

Suppliers per elevated risk category (%)



Regardless of the industry or geography in which the supplier operates, we require them to comply with applicable laws and regulations. Barclays’ standard approach to new supplier onboarding and renewal begins by assessing the services that are being provided and ascertaining the level of risk. Suppliers that are assessed as being at a heightened risk of exposure from a business risk perspective are subject to Barclays Supplier Control Obligations (SCOs). Assessment of suppliers against these controls may include, but is not limited to, reviewing copies of employment and health and safety policies and requesting suppliers to attest to supporting our expectations as defined in the TPCoC.

The TPCoC makes specific reference to the ILO Core Conventions and the UK Modern Slavery Act 2015 and is owned by Barclays’ Chief Procurement Officer. It outlines the behaviours we encourage in our supply chain and seeks to align the practices of our suppliers with our own policies. This includes on issues such as freely chosen employment (work that is completed voluntarily and without slavery, servitude, forced or compulsory labour and human trafficking) and practices absence of which could lead to exploitation in any complex global supply chain, such as lack of access to an independent whistleblowing process and grievance mechanism.

Suppliers to whom the SCOs apply become managed suppliers and are subject to ongoing management and controls assurance during the term of service. These suppliers are also asked to complete an annual self-certification against the individual topics contained within the TPCoC.

Both Sourcing and Supplier Managers are supported by an in-house modern slavery expert within our Procurement function, who advises on the assessment and remediation of modern slavery and other human rights risks associated with suppliers on a case-by-case basis.

### In 2022 we:

- Joined UK Finance – Supply Chain Sustainability working group. The group will focus on key supply chain ESG challenges affecting financial institutions, such as current and emerging modern slavery and human rights regulatory requirements, transparency within supply chains and ESG rating methodologies.
- Engaged with a number of existing suppliers in our top spend category to increase their awareness of modern slavery risks, good practice and Barclays’ expectations in managing these risks and related emerging legislative obligations.
- Included modern slavery and other sustainability-related considerations during the sourcing processes for key suppliers in categories identified as presenting an elevated risk of modern slavery, such as the renewal of our major IT services contract, large IT hardware purchases and printing solutions. For example, during the sourcing of ICT hardware for colleagues globally, we developed a tailored set of questions for potential suppliers in this category. These questions covered suppliers’ processes for responsible mineral sourcing and for avoiding workers being charged recruitment fees, mechanisms for

whistleblowing and alerting relevant authorities, modern slavery-related policy framework, and compliance approach to modern slavery legislation.

- Incorporated new contract clauses focusing on modern slavery into our standard supplier terms and conditions. Specifically, these clauses prohibit suppliers from using forced, bonded or involuntary prison labour, human trafficking, child labour or modern slavery, which include practices such as the retention of personal identification or immigration documentation and denying individuals the freedom to leave their employment. Our contract negotiators are being supported by a dedicated in-house expert adviser during the implementation of these new terms.

### During 2023 we aim to:

- Strengthen the way we identify, assess, address and monitor modern slavery and other human rights risks in our end-to-end procurement processes.
- Explore further opportunities to collaborate with individual suppliers in elevated risk categories to deliver improved outcomes to the workers providing services to us.
- Further identify and evaluate data sources to inform our supply chain modern slavery risk assessment and due diligence activity.

# Identifying, assessing and addressing modern slavery risks (continued)

## Retail customers

Criminals involved in modern slavery may use the products and services provided by our retail bank to facilitate their criminal activities, as well as launder the proceeds of these activities. We aim to continuously improve our ability to prevent, detect and disrupt this threat and have a number of mechanisms in place to identify suspicious activity linked to modern slavery. This includes an escalation process to investigate concerns raised by colleagues and, where appropriate, report to law enforcement agencies.

During 2022 Barclays identified and reported 213 cases to law enforcement that displayed modern slavery indicators, compared to 165 in 2021.

Barclays works in close partnership with both the public and private sectors to share intelligence and develop best practice in order to collectively tackle the threat of modern slavery.

### During 2022, we:

- Continued to develop our use of technology to detect modern slavery risks within our retail customer base. This technology identifies networks of association that potentially display modern slavery indicators. This also allows us to identify trends and patterns across large datasets and is configured in such a way that it improves our ability to spot suspicious activity. This programme has generated a number of referrals to law enforcement.
- Continued to support public and private sector training initiatives aimed at upskilling professionals across the financial services sector on managing financial crime risks associated with modern slavery.
- Remained committed to supporting the Finance Against Slavery and Trafficking (FAST) Survivor Inclusion Initiative and assisting survivors of human trafficking and modern slavery to open bank accounts in our branches.

- Jointly presented with the National Crime Agency at an international conference in the Netherlands, on the UK's public/private sector partnership approach, through the Joint Money Laundering Intelligence Taskforce+, to tackling the threat of human trafficking, modern slavery and organised immigration crime. The presentation was facilitated by Finance Against Slavery and Trafficking. The event was organised by the Royal United Services Institute and the Future of Financial Intelligence Sharing international research programme, in collaboration with the Netherlands Financial Expertise Centre.

### During 2023 we aim to:

- Continue enhancing our ability to proactively identify modern slavery in our customer base through the use of technology.
- Build upon our existing public/private sector relationships; partnering with key stakeholders on identifying new prevention, detection and disruption opportunities.
- Continue to develop our colleague awareness-raising strategy to equip staff with tailored information required to proactively identify new and emerging trends in modern slavery and human trafficking, such as organised immigration crime, and improve our detection capability.
- Enhance bank-wide threat assessment mechanisms to identify potential opportunities to enhance the control environment.

## Corporate clients

Management of social risks associated with corporate clients, including human rights and modern slavery risks, is governed as part of Barclays' Reputation Risk Management Framework and processes, which apply to all Barclays corporate client relationships, including those managed via Barclays Capital Asia Ltd and Barclays Bank PLC in Australia.

We have general client due diligence processes in place, including adverse media screening, which can identify the risk of clients being associated with modern slavery by banking and Know Your Customer (KYC) teams during client onboarding and relationship reviews.

Where this due diligence leads to the identification of a potential human rights risk associated with a client or transaction, these are referred for further review to the Group Sustainability & ESG and/or Financial Crime teams, depending on the nature of the concern.

We have also established position statements<sup>f</sup> covering our relationships with clients in certain sensitive sectors that may present significant adverse impacts on people or the environment. These statements detail our expectations for in-scope clients and require them to comply with applicable international standards and legislation and show a clear commitment to robust environmental and social risk management.

### Notes

<sup>f</sup> Statements cover Climate Change, Defence, Forestry and Agricultural Commodities, World Heritage Sites and Ramsar Wetlands, and are available at: <https://home.barclays/sustainability/esg-resource-hub/statements-and-policy-positions/>. Note that of these Statements, the Forestry and Agricultural Commodities Statement directly covers modern slavery risks.

In sectors where we identify modern slavery as a salient risk, over time we aim to include specific requirements for clients involved in these sectors. For example, our Forestry and Agricultural Commodities Statement includes provisions around the prohibition of forced and child labour, modern slavery and human trafficking for companies involved in forestry and palm oil production activities, as these are widely recognised as salient risks in certain countries.

We require that these companies have a time-bound commitment to achieve certification against internationally recognised certification schemes such as the Forest Stewardship Council (FSC) and Roundtable on Sustainable Palm Oil (RSPO), which include further detailed requirements and verification of company practices in relation to the prevention of forced and child labour, among other criteria.

We seek to proactively monitor issues and developments globally that may present new or elevated human rights risks, and work to investigate our potential exposure to these and consider our responsibilities to seek to mitigate these risks.

For more detailed information on our approach to managing human rights and other social or environmental risks associated with clients, please see our 2022 Annual Report and Statements and Policy positions section of our website.

## Identifying, Assessing and Addressing Modern Slavery Risks (continued)

### During 2022, we:

- Conducted reviews of 455 client relationships and transactions for environmental and social risks, undertaken by our Group Sustainability & ESG team. 14 of these client relationships and transactions were reviewed in connection with modern slavery and related labour rights concerns.
- Conducted a portfolio review of our exposure to companies in the textiles manufacturing supply chain in a region with heightened exposure to modern slavery risks. We subsequently conducted due diligence on identified clients.
- Continued an ongoing portfolio review and client due diligence exercise for companies in the renewable energy sector in a region with heightened exposure to modern slavery risks.

### During 2023 we aim to:

- Complete a strategic exercise to identify the salient human rights risks associated with our client financing portfolio to improve our understanding of human rights risks, such as modern slavery, and review our approach to managing these risks. Over time this will support us to focus our client due diligence efforts and disclosures on the issues that pose the greatest risk to people.
- Undertake a targeted review of modern slavery risks for corporate clients in at least one additional high risk sector and / or geography.

### Investments

Barclays Private Bank views responsible investing as an important part of our investment strategy. For us, Responsible Investing means integrating material environmental social and governance (ESG) considerations (among others) into our investment decisions and fulfilling our stewardship responsibilities through engagement and voting. We aim to identify, manage, and mitigate ESG risks that can materially impact long-term investment returns. We define material ESG risks as those that can have an impact on the financial or operational performance of a business. We believe ESG risks can also be mitigated and monitored through our stewardship practices.

Our Discretionary Portfolio Management (DPM) offering sits at the core of the Private Bank's long-term strategy. All our DPM strategies seek to deliver competitive investment returns for our clients and create long-term value for stakeholders. We believe that Responsible Investing helps us achieve this. As a long-term investor, we believe material ESG issues can impact portfolio returns and are important considerations in managing risk effectively and delivering successful investing outcomes for our clients. Understanding how businesses are, for example, impacting the environment, engaging with employees and key stakeholders and practising good governance help us understand how well these businesses are positioned now and for the future.

As part of our commitment to being a responsible investor, we undertake engagement and voting for investee companies in partnership with our stewardship services provider, EOS at Federated Hermes (EOS). We view engagement and voting as an important mechanism through which to hold management to account and act as a lever to promote change in our investee companies on material ESG issues where appropriate.

Through our partnership with EOS, we take a comprehensive approach to stewardship, engaging and voting with corporates and key stakeholders, such as policymakers and regulators globally.

Through our partnership with EOS, we seek to highlight key ESG issues of concern that we believe are material to our portfolio companies related to our fixed income and equity holdings. EOS's engagement with corporates takes place at board and senior executive level covering a range of topics such as climate change, executive pay, human rights and labour rights including modern slavery.

Our investment due diligence within DPM aims to consider the material and/or relevant risks of portfolio companies on human rights risks such as modern slavery, human trafficking and forced labour, workplace standards and employee relations, as a few examples. We use the International Bill of Human Rights, the UNGPs, OECD Guidelines and the principles of the UN Global Compact as guiding frameworks to flag any violations to human rights standards and other related controversies against the entity as identified by our third-party data provider.

Through our partnership with EOS, we seek to engage as appropriate with portfolio companies that are associated with actual and potential human rights impacts and seek opportunities for the company in question to take action to reduce or cease their impacts.

# Engagement and training on modern slavery

## External engagement

We are committed to continuously improving the effectiveness of prevention, detection and disruption strategies to protect our customers and communities from exploitation. We are strong advocates and seek to play a leading industry role in proactively working in partnership with both the public and private sector to try to collectively combat this threat. We engage in dialogue with a range of stakeholders, including government, law enforcement agencies, non-governmental organisations, and other banks to share our expertise and better understand the role we can play in addressing modern slavery.

### During 2022 we:

- Continued to demonstrate industry leadership by co-chairing a public/private sector intelligence sharing group focused on human trafficking, modern slavery and organised immigration crime.
- Attended several public sector forums throughout the UK aimed at promoting public/private partnership, collaboration and intelligence sharing to assist members to proactively identify threats, including modern slavery, in a timely manner.
- Supported a law enforcement-focused awareness-raising event aimed at promoting the public/private sector partnership approach to understanding and tackling modern slavery, human trafficking and organised immigration crime.

### During 2023 we aim to:

- Seek to play a role in building trusted relationships across the public/private sector to improve the quality of intelligence shared, enable early identification of threats and develop best practice.
- Continue to engage and seek opportunities with leading external stakeholders in the data analytics field, to improve our ability to identify new and emerging threats; for example, working with a third-party supplier providing rich reference lists that allows us to assess whether there is any exploitation exposure to Barclays customers.

## Training and awareness raising

Barclays is committed to providing ongoing training for its employees on the issue of modern slavery. Modern slavery content is included in our mandatory financial crime training, which all Barclays' staff are required to complete on an annual basis.

All Procurement, Events & Hospitality and Corporate Real Estate colleagues globally must also annually complete a dedicated modern slavery e-learning module, which focuses on how employees can identify and mitigate modern slavery and human trafficking risks within our operations and supply chain. This training is also available to all colleagues within the organisation.

We also host tailored awareness raising events and webinars for staff across the bank to heighten awareness of key and emerging threats.

### During 2022, we:

- Updated our Procurement Modern Slavery Training module, annual completion of which is mandatory for all Procurement colleagues.
- Built a financial crime learning platform to host awareness-raising resources and training materials for colleagues.
- Shared communications to relevant colleagues across Barclays on training resources and intelligence regarding modern slavery threats, including sexual exploitation, labour exploitation and organised immigration crime.
- Supported the finance sector training strategy commissioned by the Independent Anti-Slavery Commissioner and shared these training materials with relevant colleagues across Barclays.

### During 2023 we aim to:

- Continue to deliver targeted modern slavery awareness-raising sessions to staff, our customer base and the wider community, and assess opportunities to implement more initiatives to help victims of modern slavery reintegrate into the community.
- Explore opportunities to mitigate the risks posed by modern slavery impacting Barclays' supply chain; for instance collaborating with a third-party supplier to create a bespoke training session to upskill Procurement and Facilities Management colleagues in respect of potential modern slavery issues in the supply chain.

# Assessing the effectiveness of our actions

Through the oversight arrangements detailed in the Governance section on page 5, we are able to review the effectiveness of our modern slavery actions.

Where modern slavery concerns with a particular supplier are identified during the supplier assurance process, this will be monitored through to satisfactory closure, including review by the appropriate subject matter expert within Barclays.

We recognise that modern slavery is a hidden risk, and that evaluating our approach and progress is complex. We currently track the following selection of metrics, in order to better understand the effectiveness of our approach and seek to evolve and enhance our monitoring approach over time.

Metrics <sup>h</sup>				
Topic	Key performance indicator	2022	2021	
Colleagues	• % of assigned colleagues in Sourcing, Corporate Real Estate Services and Events and Hospitality functions completing modern slavery training <sup>g</sup>	97%	99%	
	• # of substantiated incidents related to modern slavery concerns raised through our Raising Concerns reporting channels	0	0	
Suppliers	• % of managed suppliers who have undergone assurance activity in the last 12 months (excludes supplier panels)	69	74	
Corporate clients	• # of client relationships and transactions reviewed for environmental and social risks by Barclays Group Sustainability & ESG team	455	486	
	• # of client relationships and transactions reviewed in connection with modern slavery risks by Barclays Group Sustainability & ESG team	14	14	

**Notes**

g Metric based on the percentage of assigned Sourcing, Corporate Real Estate Services and Events and Hospitality colleagues completing the 2022 Modern Slavery Training Module before 17 January 2023. Data is derived from Barclays' internal Performance, Learning and Training portal.

h This year we ceased reporting on the number of survivors assisted through opening of survivor bank accounts, as not all survivors disclose their survivor status during account openings, making this metric difficult to track accurately.

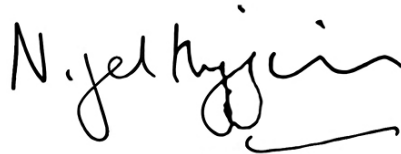
## Statement review

The Statement has been approved by the Board of Barclays PLC on 14 February 2023 and has been signed on its behalf by the Barclays Group CEO and Chairman<sup>i</sup>.



**C. S. Venkatakrishnan,**  
**Group Chief Executive**

Barclays PLC



**Nigel Higgins, Chairman**

Barclays PLC

### Appendix: Scope of Statement

This Statement covers Barclays PLC and the following subsidiary companies of Barclays PLC that are required to have a statement under the UK Modern Slavery Act 2015:

- Barclays Bank PLC
- Barclays Execution Services Limited
- Barclays Bank UK PLC
- Clydesdale Financial Services Limited
- Barclays Insurance Services Company Limited
- Barclays Investment Solutions Limited
- Barclays Capital Securities Limited

This Statement covers the following subsidiary companies of Barclays PLC that are required to have a statement under the Australian Commonwealth Modern Slavery Act 2018:

- Barclays Capital Asia Ltd
- Barclays Bank PLC

#### Notes

<sup>i</sup> The Board of Barclays PLC has approved this Statement on behalf of every entity on behalf of which the Statement is published. Those entities are listed in the Appendix.