

British Arab Commercial Bank plc
(the “Company”, “Bank” or “BACB”)

Modern Slavery and Human Trafficking Statement
For the Year Ended 31 December 2024

Introduction

This statement details the steps taken by BACB to aid in the prevention of modern slavery and human trafficking during the year ended 31 December 2024.

The Bank is committed to conducting business with the highest level of legal and regulatory standards and governance best practices while operating in an ethical and transparent manner.

The Bank provides this statement, in accordance with the Modern Slavery Act 2015, to outline the steps that are taken to ensure modern slavery and human rights violations do not take place in any part of the business or the suppliers that we deal with.

Our Business

BACB is a UK domiciled international specialist bank, employing 250 people across London and its Representative Offices in Abidjan, Algiers and Tripoli. The Bank is authorised by the Prudential Regulation Authority (the “PRA”) and dual regulated by the PRA and the Financial Conduct Authority (the “FCA”). For our clients BACB is their banking partner for specialist markets with an international correspondent banking network; BACB has proximity to those with whom the Bank does business.

The Bank relies on primarily UK based third-party suppliers for the provision of information technology and building maintenance services.

Our Suppliers and Customers

Suppliers: The Bank has a Third Party Risk Management Policy which outlines its oversight framework for the procurement and third party management of all goods and services provided by third parties. As part of on-going procedures to prevent exposure to all forms of modern slavery, the Bank conducts a process of due diligence on all suppliers, the full details of which are outlined in the Bank’s Third Party Management Policy. An assessment of the Bank’s suppliers is undertaken with each supplier vetted and scanned using external search and database tools before any business is embarked upon, and thereafter on an on-going basis. Furthermore, the Bank’s material service providers are also asked to attest that they comply with the Modern Slavery Act 2015.

Customer KYC: BACB employs a dedicated Know Your Customer (KYC) on-boarding team who review all customers at the point of on-boarding and at regular periods thereafter. Their procedures explicitly include a requirement to screen all customers and related parties for any adverse media pertaining to Slavery and Human Trafficking.

These ensure that robust procurement practices are exercised during onboarding and on a continuous basis.

BACB Colleagues

The ambition of the Bank is to foster a culture of transparency and honesty, an inclusive and ethical environment where everyone plays their part in ensuring that the needs of our customers remain paramount. Conduct and culture underpin the Bank's strategy. The Bank and its colleagues respect the differences and diversity of its people and empower them to achieve the highest standards of professionalism and integrity, as reflected in Bank policies.

All Bank colleagues (based in the UK) are paid at least the Real Living Wage, and in addition they receive a cash benefits allowance to pay towards other benefits and according to jurisdictional requirements. As a Bank all colleagues are subject to on-going continuous monitoring and are required to complete an annual attestation.

BACB embraces principles supportive of equal treatment without discrimination and with the protection of employment law for all colleagues. We endeavour to ensure all colleagues are treated equitably, without discrimination and with respect for their human rights. We adhere to the Equality Act 2010, which provides several principles enshrined in it including:

- Protection Against Discrimination
- Equal Pay
- Reasonable Adjustments
- Harassment and Victimisation

Policies

BACB through the use of its intranet and other internal communication channels ensures all relevant policies are available to all colleagues. This includes all mandatory training and training manuals relevant to modern and human trafficking as recommended by UK Government.

These include a wide range of matters covering banking operations, procurement, whistleblowing, individual accountability, risk and conduct management and people in addition to statutory and regulatory obligations.

Our approach to Compliance and Risk Management

The Bank recognises that certain jurisdictions expose it to financial crime but has no appetite to commit or facilitate such financial crime through its clients or counterparties. The Bank follows the rules and guidance of the PRA and the FCA and is committed to eradicating any sources of financial crime across its business and supply chain. This includes any other kind of misconduct and have an appropriate risk appetite and tolerance in place towards breaching sanctions, money laundering, bribery, corruption, and terrorist financing.

Although BACB considers the inherent risk of modern slavery and human trafficking occurring in the business to be low, the Bank takes its responsibility to identify and effectively respond to any incidents of modern slavery and human trafficking very seriously. BACB recognise that there are

some higher risk categories and geographies in our supply chain and operating markets and continues to closely monitor any changes in the inherent risk levels.

We do this through:

- Operating a governance and risk structure that is proportionate to the size, scale and complexity of BACB's business operations.
- Employing a range of monitoring and oversight tools, policies and processes designed to assess current and emerging risks.
- Regularly undertaking impact assessments while proactively monitoring changes in country risk profiles.

Through these and other methods the Bank is able to continually develop its internal controls to ensure these remain robust and relevant.

All colleagues are required to operate in line with the UK Individual Accountability regime, which requires individuals working at all levels to meet appropriate standards of conduct and ensures that senior managers are held to account for misconduct that falls within their area of responsibility.

Individual Accountability Framework: BACB colleagues are subject to strict conduct related rules, and standards which relate to integrity, appropriate diligence, openness, cooperation, and a duty of care to its customers.

Whistleblowing: BACB operates a Whistleblowing Framework and Policy which can be accessed confidentially, it includes a Board Level Champion and a further two supporting Senior Managers. Colleagues are aware of these individuals and are regularly provided with awareness training and prompts on the area of whistleblowing and the overall importance of speaking up.

Training

As an employer, BACB, aims to provide high quality training to enable colleagues to be risk aware and operate to the high standards expected of them. The Bank has an annual training programme which reinforces key messages in respect of the Bank's core values, the risks that the Bank is exposed to and its risk management framework. This supplements the Bank's policies and procedures, which are refreshed in response to regulatory developments and as a minimum annually.

The combination of these activities raises awareness and drives high levels of personal accountability and ethical behaviours in the Bank's colleagues, and full compliance with all legal and regulatory obligations.

Assessment of effectiveness

BACB will continue to give due regard to the requirements under the Modern Slavery Act 2015. The Bank is committed to consistently improve in this area, and we will continue to enhance our policies, systems, and processes as necessary, ensuring that the Bank continues to effectively mitigate the risks of modern slavery and human trafficking occurring within its operations.

The statement has been approved by the Board of BACB plc on 13 May 2025 and has been signed on its behalf by the Chief Executive Officer.



Paul Jennings
Chief Executive Officer
15 May 2025