

Bank of Ireland Group

Modern Slavery & Human Trafficking Statement 2024

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and applies to Bank of Ireland Group plc and its UK subsidiaries listed below with respect to the financial year ending 31st December 2023.

- Bank of Ireland (UK) plc
- NIIB Group Limited
- The Governor and Company of the Bank of Ireland, trading through its third country branch UK.

For the purposes of this statement, Bank of Ireland Group plc and its UK subsidiaries listed above are collectively referred to throughout as the “Group.”

What is Modern Slavery and Human Trafficking?

The Modern Slavery Act 2015 (the “Act”) is aimed at combating crimes of slavery and human trafficking. Modern slavery includes both offences under the Act: (i) slavery, servitude and forced or compulsory labour; and (ii) human trafficking. UK Home Office guidance defines **slavery** as behaviour which deprives the victim of his or her freedom as though the offender owns the person. **Servitude** is where a person is obliged to provide a service through the use of coercion. **Forced or compulsory labour** is where a service is exacted from a person under the menace of a penalty, where the person has not offered themselves voluntarily and involves coercion, which may be direct threats of violence or more subtle forms of compulsion. The offence of **human trafficking** arises when a person arranges or facilitates the travel of another person with a view to that person being exploited, even where the victim consents to the travel.

Our Approach and Commitment

The Group is committed to improving our practices to combat modern slavery and human trafficking in our business and supply chain. The Group is one of the largest financial services providers in Ireland, with total assets of €156bn at 31 December 2023, providing a broad range of banking and other financial services. The Group employed an average of 10,562 employees in 2023.

This statement sets out the steps the Group has taken in 2023 to identify, assess and mitigate the risk of modern slavery and human trafficking in our supply chain or in any of our business operations in the United Kingdom and elsewhere. This statement also describes our focus for the year ahead.

The Group remains committed to trade ethically, source responsibly and work to combat modern slavery and human trafficking in all its forms across all jurisdictions in which the Group operates. This commitment is an integral part of the Group's policies and approach to protecting human rights and is a foundational element of the Group Sustainability Strategy. In 2023, we continued to utilise network analysis technology to aid in the identification of potential human trafficking rings. This technology uses transactional data to establish a holistic view of potentially criminal activity and enables our Financial Crime Compliance function to provide more effective reports to the statutory authorities. We have also been instrumental in the development of new technology designed to identify potential human trafficking red-flags in large data sets. The Infinitech Project is an EU funded project, which involves collaboration between various parties including the BPFi, Bank of Ireland, Stop the Traffik, IBM & National University of Ireland, Galway. The scope of the project is to leverage AI technologies and 'big data' to help identify human trafficking typologies, which might be present in large data sets, for the purpose of providing more accurate and useful intelligence for financial crime investigation teams. This allows for unstructured data (such as news articles) to be employed in order to train an AI model to create red flag indicators that can identify potential human trafficking activity. This project has been recognised within the financial services industry, both domestically and within Europe, as a first for a financial institution in the proactive monitoring and disruption of human trafficking.

More broadly, the Group's ambition to prevent human rights abuses is reflected in our commitments under the UN Environment Programme Finance Initiative, and the UN Principles for Responsible Investment and is central to advancing progress against the UN Sustainable Development Goals.

Our Business

The Group is organised into four trading segments and one support division to effectively serve our customers.

Retail Ireland - Retail Ireland serves its customers delivering day-to-day services, products, propositions, and a financial wellbeing programme tailored to meet customers' individual needs.

Wealth and Insurance - Wealth and Insurance includes the Bank of Ireland Group's life assurance subsidiary New Ireland Assurance Company (NIAC) and Davy, Ireland's leading provider of wealth management and capital markets services.

Retail UK - Retail UK incorporates the UK residential mortgage business, the branch network and business banking business in Northern Ireland, as well as asset finance and contract hire, incorporating NIIB Group Limited. It also includes the financial services partnership and FX joint venture with the UK Post Office. In December 2023, Retail UK announced the conclusion of its financial services partnership with the AA and ceased the provision of unsecured personal loan products under the Bank of Ireland UK and Post Office brand. The Retail UK division includes the activities of BoI (UK) plc, the Group's wholly owned UK licenced banking subsidiary. The Group also provides banking services in the UK through its UK branch. This comprises corporate and business banking activities and the management of certain residential mortgage

contracts which have been retained by the UK branch and which are funded primarily via cross currency derivatives.

Corporate and Commercial- In 2023, Global Markets and Corporate Banking (together formerly known as Corporate and Markets division) were consolidated with Business Banking into a single 'Corporate and Commercial' division, bringing together extensive expertise to efficiently and consistently deliver the highest service levels to all of the Bank of Ireland Group's Corporate and Commercial customers.

You can find out more about Bank of Ireland Group's trading divisions in all jurisdictions, and a full list of its products and services [here](#).

Our Purpose, Values and Strategy

The Group's culture is rooted in our Purpose 'Helping you thrive' and brought to life by our four values of 'Customer First, 'Better Together,' 'Take Ownership' and 'Be Decisive,' cocreated with colleagues in 2023. The Culture Action Plan 2023/24 reflects planned strategic deliverables that will accelerate culture change and is aligned to our purpose and values.

Our strategy is built on three strategic pillars: building stronger relationships with our customers and colleagues, continuing to simplify our business, and creating a culture of constant improvement in the sustainability of the company for the future.

Within the Group's sustainability strategic pillar is our 'Investing in Tomorrow' strategy. Our focus is on our material Environmental, Social and Governance (ESG) impacts and opportunities aligning to science and best practice, starting with the UN Sustainable Development Goals (SDG), the blueprint for a more sustainable future for all.

Our Sustainability strategy and approach centres on three pillars: supporting the green transition, enhancing financial wellbeing, and enabling our colleagues to thrive, supported by a number of foundational topics spanning our culture, business ethics, community investment, financial crime, sourcing responsibly, health and safety, human rights, cyber security, and data protection.

Our Policies and Codes

Bank of Ireland Group operates a number of policies and policy standards which reflect our objective to act ethically and in line with all legal and regulatory obligations to our customers, colleagues, shareholders, and wider society. The Group has adopted all of these policies and policy standards in the operation of its businesses in the UK. These policies and codes are available on our website at [Our Reports and Policies - Bank of Ireland](#).

- **Group Code of Conduct** reflects our core values and competencies and sets out the standards and behaviours required of all Bank of Ireland Group colleagues and our commitment to prevent

modern slavery and human trafficking in all parts of our business and our supply chain. The Code of Conduct was reviewed in 2023 to align fully with the Individual Accountability Regime, including the Common and Additional Conduct Standards.

- **Group Speak Up Policy** sets out how all Bank of Ireland Group colleagues can safely and confidentially raise a Speak Up concern about suspected or actual wrongdoing in the workplace, without fear of recrimination and in confidence that concerns will be investigated and remediated as required. It also describes what a colleague can expect when reporting a Speak Up concern and is designed to protect whistle blowers.
- **Group Financial Crime Framework and Financial Crime Compliance Statement** sets out our commitment to protect our customers, colleagues, and communities from the adverse effects of financial crime, and support government and regulators in effective financial crime prevention. Our Financial Crime Investigations hub sets out how to report any suspicions or concerns in relation to modern slavery relating to the Group. The Group Financial Crime Compliance framework comprises three distinct elements:
 - **Anti-Money Laundering Programme**, which concerns the risk that the Group is used by customers or third parties to facilitate money laundering.
 - **Terrorist Financing and Financial Sanctions Programme**, which concerns the risks that the Group is used by customers or third parties to facilitate terrorist financing; and that the Group provides access to financial services to individuals /entities on the EU, HM Treasury or Office of Foreign Assets Control (OFAC) sanctions lists.
 - **Anti-Bribery and Corruption Programme**, which is defined as the risk that bribery and corruption is not effectively managed within the Group or through its third parties.
- **Group Social & Financial Inclusion Statement** sets out our commitment to ensuring that no individual is prevented from accessing the financial system, solely due to their inability to produce standard anti-money laundering identification documentation.
- **Group Recruitment Policy** sets out our commitment to reaching and recruiting people from a broad talent pool, and to opening career opportunities to all our people to enable them to reach their full potential. The principles of equality, diversity and inclusion underpin all aspects of recruitment activity.
- **Group Health and Safety Policy** sets out our commitment to ensuring a safe and healthy environment for Group employees as well as temporary workers, contractors, visitors and third parties.
- The Group ESG Risk Management Framework sets out the approach to the management of ESG risk factors in the Group.

The Group continues to review and update our policies in line with our Group Risk and ESG Risk Management Frameworks to ensure that we are aligned in our approach to combating modern slavery and human trafficking in all jurisdictions in which the Group operates.

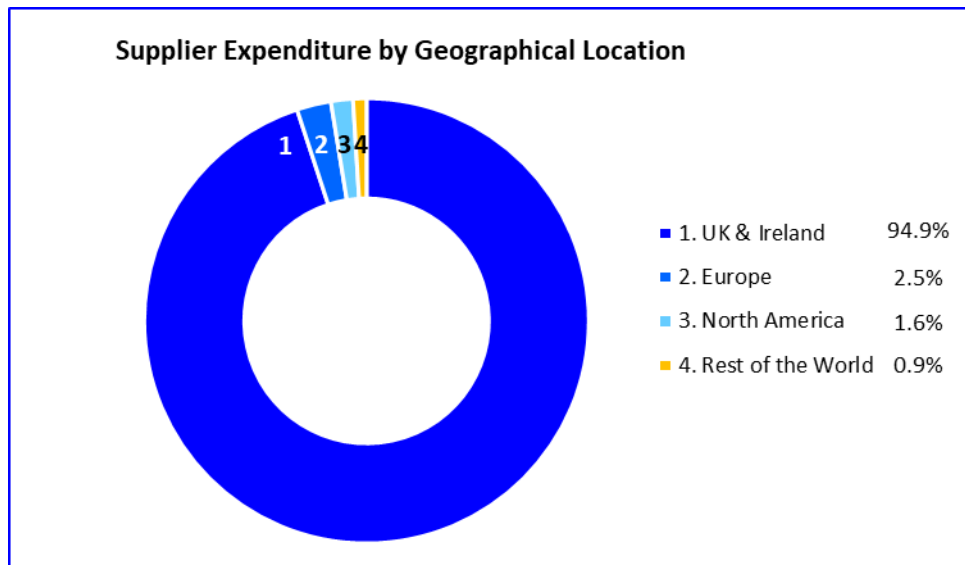
Our Supply Chain

Responsible sourcing to ensure human rights and environmental protection in our value chain remains at the centre of our procurement processes and is shaped by current best practice including compliance with modern slavery legislation and our commitment to the United Nations Principles for Responsible Banking (UNPRB). Conducting our business in a responsible and sustainable manner is fundamental to achieving our purpose of helping customers and the communities we serve to thrive. The Group Procurement objective of sourcing responsibly supports this, ensuring we act ethically and responsibly when the Group sources goods and services from our suppliers.

The Group recognises that efforts to mitigate modern slavery risks in the supply chain is a fundamental aspect of the Corporate Sustainability Reporting Directive (CSRD). During 2023, as part of our preparation for our first CSRD compliance report for 2024, we undertook a Double Materiality Assessment (DMA) with extensive stakeholder engagement. A DMA is the essential first step towards CSRD compliance that identifies which sustainability-related matters are most material to the Group and our stakeholders, taking both an “inside-out” approach (i.e. Impacts (I) that the Group has on sustainability matters) and an “outside-in” approach (i.e. Risks (R) and Opportunities (O) that may be generated by sustainability matters that can have financial effects on the Group). This process built on our previous Materiality Assessment updating our understanding of our material ESG risks and opportunities, and their financial effects on the Group. The results are informing our strategy and processes for managing our Impact, Risk and Opportunity (IROs). They are shaping our ESG data collection and form the basis of the Group’s CSRD reporting requirements expected in Q1 2025. CSRD will be a significant input into our overall Sustainability strategy as we aim to support a deeper integration of sustainability across our operations, and this includes influencing decision making at every level.

Supplier Due Diligence

- The Group’s supply chain is predominately comprised of suppliers providing IT and infrastructure services, business processing, consultancy, and professional services to the financial sector. We have completed analysis of our suppliers based on expenditure, geographical location, and service category for the year-end 2023. This highlights that the majority of our suppliers are based in regions categorised as low risk per the 2023 Walk Free Global Slavery Index.



- The Group has seven global strategic partners providing ICT outsourcing services from India, Sri Lanka and The Philippines which are considered higher-risk locations. We adopt a risk-based approach to closely monitor these suppliers which are subject to ongoing risk assessments and supplier due diligence by dedicated sourcing risk management team in Group Procurement and Business divisions. Equally the majority of our expenditure is in service sectors considered as low risk, but we remain alert to the risk of modern slavery and human trafficking through our operations and engagement with higher risk service sectors.
- In conducting appropriate supplier due diligence, we assess our suppliers across a number of key risk areas, at the on-boarding stage for all suppliers and annually thereafter for suppliers providing services of high criticality and dependency to the Group. We subscribe to and leverage the Financial Supplier Qualification System (“FSQS”), managed by Hellios in completing supplier due diligence. FSQS standardises and manages our requests for supplier compliance and assurance data and to ensure that all our suppliers meet our policy compliance standards. Suppliers to the Group are asked to provide evidence of compliance with relevant human rights legislation including, without limitation, the Modern Slavery Act 2015.
- In 2023, we further refined our Request for Proposal (RFP) suite to ensure that Sustainability, ESG and Human Rights are appropriately considered in our supplier engagement and selection process. Our RFP suite links to our Code of Supplier Responsibility and Third-Party Policies which are covered in more detail below.
- Several policies as referenced in this statement, and initiatives, including our Code of Supplier Responsibility and Vulnerable Customer Unit, guide our approach to mitigating the risk of modern slavery and human trafficking within our business or our supply chain. Through the work of our Financial Crime Compliance team, in partnership with global non-governmental organisation (NGO), 'Stop the Traffik' we are actively helping to identify and disrupt money flows from human trafficking and in improving the accessibility of financial services to victims of human trafficking.

- **Our Code of Supplier Responsibility** was updated in 2023. This Code sets out our ongoing expectations of our suppliers in the way they conduct business with us and seeks to promote ethical business practices within our supply chain. It also seeks certain assurances, where appropriate, from our suppliers that they are complying with all applicable laws and regulations including, but not limited to, applicable laws and regulations regarding modern slavery, human rights, and the use of forced or child labour. Group suppliers are requested to confirm adherence to the Code of Supplier Responsibility via FSQS as part of the supplier due diligence process and this is tracked by Group Procurement for critical suppliers. Our suppliers are also expected to adhere to our **Group Third Party Policies** which summarise Bank Policies into mandatory requirements we expect our suppliers to meet. Our Code of Supplier responsibility and Group Third Party Policies are available on our website at [Working with Suppliers | Bank of Ireland](#).
- In addition, we expect our suppliers to adhere to our standards and work with us to monitor emerging risks and champion positive systemic change and we have appropriate supplier audit rights included in our standard supplier contractual agreements. Our suppliers are contractually required to notify us of a breach of applicable laws or regulations and outline their practices and procedures to ensure they do not engage in modern slavery or human trafficking (including within their own supply chain). This includes monitoring the content of modern slavery and human trafficking statements published by our critical suppliers and completing additional assurance activity when we visit supplier sites.

Training and Awareness

- Protecting the integrity of the financial system from financial crime risk including money laundering, terrorist financing, bribery and corruption is of paramount importance to the Group. All Group colleagues are required to complete mandatory training and assessments annually, so that the Group's policies and procedures are embedded in operational activities. The Group Code of Conduct, Human Trafficking Awareness and Speak up Policy mandatory training is in place for all Group personnel and all staff have a legal obligation to report any suspicious activities that may indicate possible human trafficking, including modern slavery and sexual exploitation.
- In 2023, the Group introduced Sustainable Company mandatory training for all colleagues and ESG Awareness training for senior leadership and partnered with Stop the Traffik to deliver a Modern Slavery & Human Trafficking colleague training day designed to further awareness of modern slavery and human trafficking risk, and the associated preventative measures that can be adopted.

Our focus in 2024 and beyond

- The Group will continue key partnerships with Stop the Traffik, Traffik Analysis Hub, and Infinitech, as part of ongoing efforts to prevent the risk of modern slavery and human trafficking in our supply chain or in any of our business operations.
- The Group will continue to review and enhance our Financial Crime Framework and supplier due diligence processes aligned to our ESG Risk Management Framework. This will include focus on

mandatory training completion rates for publication in future statements and leveraging external independent ESG ratings to support enhanced insight on modern slavery and human rights in our supply chain.

- The Group will continue to publish our annual Modern Slavery & Human Trafficking Statements on the UK Government Modern Slavery Registry [Modern slavery statement registry - GOV.UK \(modern-slavery-statement-registry.service.gov.uk\)](https://www.gov.uk/modern-slavery-statement-registry) to support transparency in standards and modern slavery risk management practices in the Group. This follows publication of our 2023 Statement on the registry.

Governance & Approval

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's modern slavery and human trafficking statement for the financial year ending 31st December 2023. This Statement was approved by the Group Sustainability Committee under delegated authority of the Group Board on 20th May 2024.

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Myles O'Grady

Group Chief Executive Officer

20th May 2024