

Bank of Ireland Group

Modern Slavery & Human Trafficking Statement 2025

Introduction

Modern slavery is one of the most pervasive forms of human rights abuse worldwide with an estimated 49.6m people living in modern slavery according to the latest global estimates¹. It is constituted in the [UK Modern Slavery Act 2015](#) by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'.

As Ireland's National Champion Bank, Bank of Ireland Group take our obligations in combating modern slavery risks seriously and are focused on delivering positive impact in this area. We recognise the devastating impact that modern slavery and human trafficking can have on victims, survivors, colleagues, customers, communities and supply chains, and the increasing importance of mitigating modern slavery risks as part of our sustainability strategy and commitments to regulators, customers, colleagues, investors, partners, and society at large.

This is our eighth Modern Slavery & Human Trafficking Statement. It sets out the steps Bank of Ireland Group has taken in 2024 to identify, assess and mitigate the risk of modern slavery and human trafficking within our business and supply chain and sets out our focus areas for 2025.

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 subsidiaries listed below with respect to the financial year ending 31st December 2024.

- 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 subsidiaries listed above are collectively referred to throughout as "Bank of Ireland Group" or the "Group".

Further detail on how the Group manages Environmental, Social and Governance (ESG) risks can be found in the Group Annual Report [at www.bankofireland.com](http://www.bankofireland.com).

¹ Walk Free Global Slavery Index 2023

Our Purpose, Values and Strategy

The Group's purpose is to help customers, colleagues, shareholders, and society to thrive. It is expressed through our Values of **Customer First**, **Better Together**, **Take Ownership** and **Be Decisive**, experienced in our culture and delivered through our Strategy.



Customer first

Everything we do is for our customers. Our business is designed around them.

We are empathetic, we listen, and we work hard to meet their needs, connecting with them to make them feel valued. Their success is our success.



Better together

We achieve more when we work together.

We collaborate, we share ideas, we challenge thinking, and we learn from and care for one another. We value the real power that lies in our capacity to harness our diverse skills and experiences for the good of the whole.



Take ownership

We are trusted and supported to take ownership for our actions.

We are trusted and supported to deliver the commitments we make to our customers, colleagues and communities. We accept responsibility for our decisions and actions.



Be decisive

We move quickly and make things simple to deliver positive outcomes for customers and for us.

We move quickly, with purpose, to deliver our promises for customers and the Bank. We exercise good judgement, avoid complexity and work smarter together to get to the solution quickly.

The Group Strategy is built on three strategic pillars of Stronger Relationships, Simpler Business and Sustainable Company. Our 'Investing in Tomorrow' Sustainability strategy is embedded in the Group's sustainable company strategic pillar and is focused on our material Environmental, Social and Governance (ESG) impacts and opportunities aligning to science and best practice including the UN Sustainable Development Goals (UN SDGs). Our Sustainability Strategy and approach centres on supporting the green transition, enhancing financial wellbeing, and enabling colleagues to thrive.

These pillars are underpinned by Social and Governance foundational topics including Community Investment, Health and Safety, Sourcing Responsibly, Human Rights, Culture, Business Ethics, Cyber Security, Data protection and Financial Crime.

Our Approach and Commitment

The Group is committed to trading ethically, sourcing responsibly and actively working to combat modern slavery and human trafficking², in all its forms and in all jurisdictions in which the Group operates. This commitment is an integral part of Group policies and approach to protecting human rights, is a foundational element of the Group Sustainability Strategy and is reflected in our commitments under the

² The UK anti-slavery charity Unseen states that modern slavery is the illicit trade in human beings who are turned into commodities to be bought, sold, and exploited, while human trafficking is the movement of people by means such as force, fraud, coercion, or deception with the aim of exploiting them. 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.

UN Environment Programme Finance Initiative, and the UN Principles for Responsible Investment and is central to advancing our progress against the UN Sustainable Development Goals.

The Group approach to mitigating the risk of human rights abuses aligns with the requirements of the UK Modern Slavery Act 2015. Our approach also considers the European Union (EU) Corporate Sustainability Reporting Directive (CSRD) which mandates the Group to present a comprehensive perspective ESG topics, covering both the issues that affect the Group's business and those influenced by the Group's operations, including its value chain. For further information related to the Group's primary Sustainability disclosures, please see the 'Sustainability Statement,' published in line with the CSRD in the Group Annual Report for the financial year-end 2024

Our Business

Bank of Ireland Group is one of the largest financial services providers in Ireland, and incorporates Bank of Ireland (UK) plc, the Group's wholly owned UK licenced banking subsidiary. The Group provides a broad range of banking and other financial services and reported total assets of €162bn as of 31st December 2024. The Group total employee headcount at the end of 2024 was 11,488 calculated based on the total number of active permanent and fixed-term employees at the end of the year.

Financial Performance	<ul style="list-style-type: none">• €1.9bn PBT• 46% Cost Income Ratio• 14.6% Common Equity Tier1
ESG Performance	<ul style="list-style-type: none">• #1 bank recognised for financial wellbeing among Irish consumers• €14.7bn Sustainability Related Finance• Female leadership appointments 48%• "First Wave" CSRD Reporter
Customers Employees Communities Suppliers	<ul style="list-style-type: none">• 1.9m Current Accounts• 11,488 employees• €500K Community Fund Strategic Grants• 1,830 suppliers transacted

The Group is organised into five operating segments and one support division

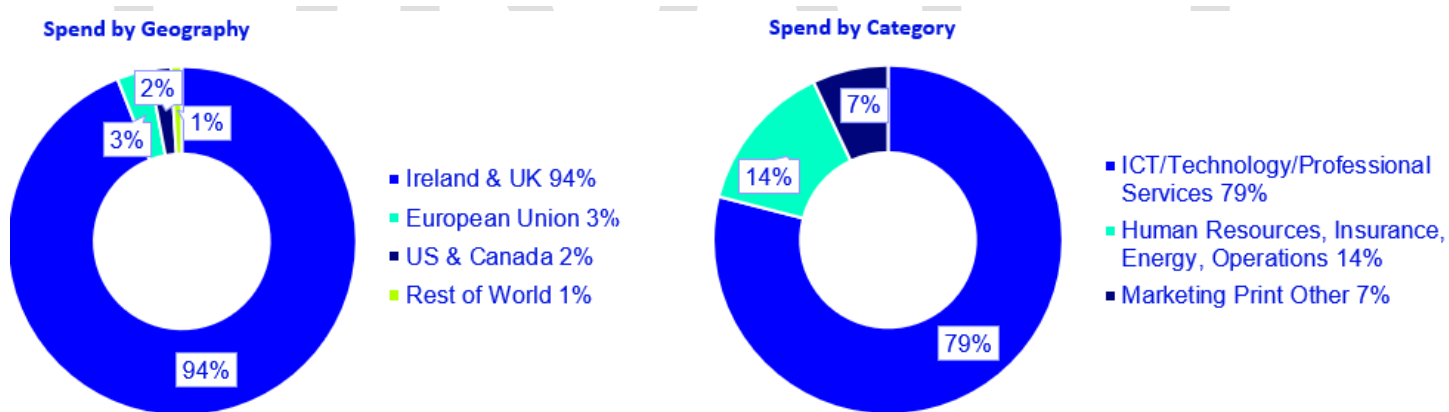
- **Retail UK** - The Retail UK division includes the activities of Bank of Ireland (UK) plc, the Group's wholly owned UK licenced banking subsidiary. The Group also provides banking services in the UK through its UK branch.
- **Retail Ireland** - Retail Ireland serves its customers delivering day-to-day 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 Group.

- **Corporate and Commercial** - The Corporate and Commercial division provides a full range of lending, banking and treasury risk management services to the Group's national and international Corporate and Business customers.
- **Group Centre** - Group Centre incorporates the Group's central support and control functions.

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

Our Supply Chain

The Group's supply chain is predominately comprised of suppliers providing Information Communication Technology (ICT)/Technology services and professional services from geographic locations categorised as low risk per the Global Slavery Index. The Group transacted with 1,830 suppliers in 2024, and we have updated our analysis of our suppliers based on expenditure, geographical location, and service category for the year-end 2024. This has not highlighted any material change to the profile of our supply chain with reference to the primary value chain (our services) and secondary value chain (activity supporting the primary value chain). While suppliers are contractually obligated to comply with all applicable laws, including local labour laws and regulations for the areas in which they operate, these locations do not pose a significant risk of incidents of forced or child labour.



The Group has nine suppliers providing some elements of ICT services from India, Sri Lanka and The Philippines which are recognised as higher-risk locations. These suppliers are multinational companies and among our most strategic partners, are subject to ongoing supplier relationship management, risk assessments and supplier due diligence by dedicated third party risk management teams within the Group. As part of our oversight of these strategic partners, the Group also leverages external real-time intelligence for offshore locations monitoring which includes ESG risk and modern slavery indicators.

The majority of our third-party supplier expenditure is within service sectors considered as low risk, but we remain alert to the risk of modern slavery and human trafficking through our operations including relating to services from suppliers in higher risk service sectors including catering and construction.

Our Policies and Codes related to Modern Slavery

Bank of Ireland Group operates a number of policies, statements and Codes 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 continues to review and update these policies and statements, typically on an annual cycle, 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.

The Group has adopted all of these policies in the operation of its businesses in the UK. All Group policies are easily accessible by colleagues via a central internal policy hub. In addition, the below key policies relevant to mitigating modern slavery risks are published on our website at [Our Reports and Policies - Bank of Ireland](#) with the exception of the Group Speak Up Policy which is available at [Corporate Governance - Bank of Ireland Group](#).

- **Group Human Rights Policy** the Group's first Human Rights policy was approved by the Group Board of Directors in December 2024. It accords with the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, OECD guidelines for Multinational Enterprises, International Labour Organisations Declaration on Fundamental Principles and Rights at Work. The purpose of this policy is to provide information about the Group's commitments and efforts to respect human rights in all its business activities and relationships.
- **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 including Group requirement to protect and provide extra support to vulnerable customers. The Code also specifies the UK Prudential Regulation Authority and Financial Conduct Authority Individual Conduct Rules that apply to all in-scope colleagues and Central Bank of Ireland Additional Conduct Standards (applicable to all Controlled Function and Pre-Approval Function role holders).
- **Group Financial Crime Policy Compliance Statement** sets out our commitment to protect our customers, colleagues, and communities from the adverse effects of financial crime which includes human trafficking, 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.
- **Group Speak Up Policy** - sets out how to raise a Speak up concern via internal and external channels, without fear of recrimination and in confidence. Details on how to speak up are also included in the Group Code of Conduct. The speak up policy is published within the corporate governance section of the Group website [Corporate Governance - Bank of Ireland Group](#).
- **Group Code of Supplier Responsibility** - sets out the key social, ethical and sustainability standards that we want our suppliers to achieve, aligned with our Sustainability Strategy, Group

Code of Conduct and Group Third Party Policies. The Code highlights our key priorities, including ensuring we foster a diverse and inclusive supply chain through to ensuring individuals across our supply base work in a manner which is both safe and healthy. We share the code with suppliers as apart of part of our sourcing process and request suppliers to confirm their adherence with the code as part of supplier due diligence. **Our Code includes the following key principles that suppliers must adhere to:**

- confirm agreement to comply with the Code and Group Third Party when completing our Financial Services Qualification System (FSQS) process.
 - understand the ethical, sustainability, accessibility, and inclusivity practices of the suppliers' sub-contractors to enhance effective risk management in these areas.
 - respect the human rights of their employees and comply with all relevant legislation, regulations and directives in the countries and communities in which the supplier operates including compliance with the UK Modern Slavery Act (where applicable).
 - prohibit forced labour (slavery) and human trafficking in their supply chain and give all employees the right and ability to leave employment with the supplier if they choose.
 - prohibit child labour
 - inform us if anything changes that may impact supplier ability to comply with the Code.
 - speak up via SpeakUp@boi.com if concerned about any actions or decisions that contravene the standards set out in the Code.
- **Group Third Party Policies** - Our Third Party Policies summarise internal Group Policy statements into mandatory clear requirements that we expect our Third-Party Suppliers to meet and reflect our commitment to regulatory compliance, operational resilience, operational excellence, and our shared success. Environmental, Social and Governance (ESG) factors, including relating to climate change, and ethical, transparent, and sustainable use of Artificial Intelligence must be assessed and addressed by suppliers in meeting the Third-Party Policies standards. Third Party Policies also detail the standards we expect our suppliers to apply in managing their own suppliers (the Group extended supply chain).

Raising Concerns

The Group actively engages our stakeholders, including employees, local communities, and human rights organisations, to understand concerns and collaborate on addressing human rights issues. The Group maintains accessible and confidential reporting channels for employees, customers, suppliers and other stakeholders to raise concerns about human rights violations. Reports will be investigated promptly, and appropriate actions will be taken in response to substantiated claims. The process for customers to report complaints or grievances can be found here: [Customer Feedback & Complaints Process](#).

In addition, colleagues and external parties can safely and confidentially raise concerns regarding known or suspected wrongdoing in current or past work activities in the Group or within our Supply base without

fear of penalisation. Details on how to raise concerns to internal Group authorised recipients, the Group Speak Up Desk SpeakUp@boi.com and external bodies are set out in the **Group Speak Up Policy** and **Group Code of Conduct**. The latter is published on our website at [Our Reports and Policies - Bank of Ireland](#).

Our Due Diligence - Identifying, Assessing and Mitigating Modern Slavery Risks

Financial Crime Prevention and Responsible Investment and Asset Management

The Group is committed to responsible investment under our voluntary commitment to UN Principles for Responsible Investment (PRI). We recognise human trafficking as a financial crime and have designed and implemented a comprehensive Financial Crime Compliance framework to detect, prevent and deter this risk and continue to invest in our people and systems to support financial crime prevention. We also recognise the potential risk exposure that can result from financing or investing in companies in sectors at higher risk of human trafficking or labour malpractice such as construction and agriculture. The Group integrates ESG principles into our operations including customer due diligence and know your customer verification checks, sustainable investing practices, and responsible advice and support for our customers.

Partnerships, 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, to enable embedding the Group's policies and procedures 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.

To promote a culture of responsible banking, the Group recognises the importance of developing sustainability-related skills and expertise across the organisation. As outlined in the Group Sustainability Statement, Board members received training on ESG topics in 2024. 'All colleague' training on Sustainability was launched in 2023 and has continued throughout 2024.

The Group Financial Crime Compliance team, in partnership with global non-governmental organisation (NGO), 'Stop the Traffik' continue to actively identify and disrupt money flows from human trafficking.

Community Engagement

The Group actively engages our stakeholders, including employees, local communities, human rights organisations and advocacy bodies to understand concerns and collaborate on addressing human rights issues. The Group maintains accessible and confidential reporting channels as outlined in the raising concerns sections for employees, customers, suppliers and other stakeholders to raise concerns about

human rights violations. Reports will be investigated promptly, and appropriate actions will be taken in response to substantiated claims.

Supply Chain and Supplier Due Diligence

The Group applies a risk-based approach to Third Party Risk Management (TPRM) commensurate with the nature, scale, and criticality of the services from the suppliers. The Group Supplier Criticality Methodology is the defined Group methodology used to determine the Criticality or Importance of the services from the supplier, and to determine the inherent risk profile of the supplier including initial assessment of ESG risk aligned to regulatory requirements. Our suppliers are contractually bound to comply with applicable jurisdictional laws and to notify us of a breach of applicable laws or regulations. They also are required to outline their practices and procedures to ensure they do not engage in modern slavery or human trafficking including within their own supply chain. Lower risk suppliers are subject to onboarding and ongoing company financial and sanctions screening while additional and more detailed due diligence is completed for our higher risk suppliers.

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 and for which the majority of our supply chain resources sit within. We subscribe to and leverage the FSQS, managed by Hellios in completing supplier due diligence. FSQS standardises and manages our requests for supplier compliance and assurance data to ensure that all our suppliers meet our policy compliance standards. FSQS has broad ESG coverage and analysis that enable us to assess the most salient human rights risks including relating to labour standards, forced labour, child labour, modern slavery, health and safety and inclusion and diversity. Suppliers must complete the FSQS questionnaire on an annual cycle and are required confirm adherence to our Group Code of Supplier Responsibility and Group Third Party Policies when completing the FSQS process. The Group also monitors that critical suppliers in scope of UK modern slavery legislation publish an annual modern slavery and human trafficking statement and works with those suppliers to remediate any issues or compliance gaps identified.

Our updated Group Code of Supplier Responsibility and Group Third Party Policies are available on our website at [Working with Suppliers | Bank of Ireland](#) and at [Our Reports and Policies - Bank of Ireland](#).

Accelerated Payment Terms – we recognise that timely payment of supplier’s invoices can support cash flow for smaller business and is a means of mitigating potential worker exploitation through late payment or non-payment of wages. Our payments terms initiative for small and medium enterprises accelerates our payment terms to 10 days providing critical cash flow support to these smaller enterprises.

Our Progress in 2024

The Group made positive progress against our 2024 commitments and advanced a number of other partnerships, policy, reporting and supply chain activity as detailed below.

2024 Statement Commitments & Update	Continue key partnerships with Stop the Traffik, Traffik Analysis Hub, and Infinitech <ul style="list-style-type: none"> Infinitech Proof of Concept completed Q4 2024 supported by Stop the Traffik 	Continue to Review Financial Crime Framework and supplier due diligence (SDD). Include mandatory training completion rates in future statements <ul style="list-style-type: none"> Financial Crime Framework subject to annual review in 2024 Enhanced SDD Technical Standards developed in 2024 Mandatory Training completion rates included in YE 2024 Statement 	Continue to publish our annual Modern Slavery & Human Trafficking Statements on the UK Government Modern Slavery Registry <ul style="list-style-type: none"> Statements published on the registry effective from YE 2022 statement
	Partnerships & Training <ul style="list-style-type: none"> Partnered with Ruhama for in-person modern slavery training with customer-facing Group Colleagues Partnered with Community Foundation Ireland to develop a pilot financial resilience programme 	Human Rights Policy & Reporting <ul style="list-style-type: none"> Human rights Policy developed and approved by Group Board Q4 Reported on our Human Rights processes and actions in the Financial Year end 2024 Annual Report Completed second annual Principles for Responsible Investment (PRI) reporting cycle 	Suppliers <ul style="list-style-type: none"> Contract suite updated for “SESG” laws, policies, regulations & standards & Request for Proposal Suite refined Code of Supplier Responsibility updated Group Third Party Policies updated Accelerated Payment Terms initiative for small & medium enterprises continued

Policy Development

- The Group developed and published a Board approved Human Rights Policy aligned to international Standards. The policy is available on the Group website: [Our Reports and Policies - Bank of Ireland](#).

Corporate Sustainability Reporting Directive (CSRD)

- 2024 was a pivotal year in terms of sustainability reporting across the European Union (EU), with CSRD coming into force. Bank of Ireland Group was a ‘first-wave’ reporter, the first in Ireland - and we believe this provides our stakeholders with considerably enhanced disclosures and insights on key topics of material importance and focus.
- Following approval of the Group’s Human Rights policy, we reported on our Human Rights processes and actions in the Financial Year end 2024 Annual Report. This included detail on the scope of policy, governance, due diligence and stakeholder engagement.

Infinitech

- We continued our significant involvement with the Infinitech Project which began in 2022 as a collaboration between various organisations, including the European Union, IBM, University of Galway, Stop the Traffik and Bank of Ireland Group. The scope of the project is to leverage Artificial Intelligence (AI) technologies and ‘big data’ to help identify human trafficking indicators, which might be present in large datasets, for the purpose of providing more accurate and useful intelligence for financial crime investigation teams. During 2024, the model that had been developed over the previous two years was initiated within the Group’s IT architecture to allow

for a 'proof of concept' phase to be completed. This was successfully achieved by Q4 2024, with multiple typologies used to identify various accounts that our subject matter experts in the financial crime function found suspicious, including accounts that had been previously reported to the statutory authorities on suspicion of being linked to modern slavery / human trafficking activity. The project is now progressing to a fully embedded process which will significantly enhance the Group's capabilities in detecting and disrupting human trafficking activity.

- **Ruhama Partnership** - In 2024, the Group partnered with Ruhama, an Irish NGO and registered charity, to provide training to colleagues on human trafficking. Ruhama work directly with the survivors of trafficking. The goal of the training was to provide colleagues with the necessary tools and information needed to recognise the signs of trafficking and respond appropriately. Colleagues who completed the training gained an understanding of the people behind the statistics. Four training sessions were held in different locations throughout the country with 70 colleagues completing the training.

Investment & Asset Management

- The Group successfully completed our second annual Principles for Responsible Investment (PRI) reporting cycle, demonstrating our commitment to responsible investment as signatory to the United Nations Principles for Responsible Investment (UNPRI).

Financial Health and Inclusion

- As a founding signatory of the United Nations Principles for Responsible Banking (UNPRB) commitment to Financial Health and Inclusion, we published our targets to 2030. Our targets are focused on financial resilience, both day-to-day and life event, and supporting prioritised groups. Financial Health & Inclusion - As part of the Group's 'Financial Wellbeing Ambition 2023 – 25'. the Group partnered with two charities facilitated by Community Foundation Ireland, providing funding to develop a pilot test and learn financial resilience programme to demonstrate the feasibility of financial education to positively impact the financial lives of marginalised women. This commitment has been approved and funded and will be delivered in 2025 with ambition to scale based on demonstrable impact. Learnings will also inform how other prioritised groups can be supported and impacted positively.
- Our expanded "Money Worries" hub provides customers resources to support them if they are experiencing financial difficulty. The Group "Extra Help" hub provides a range of additional supports for customers, families and carers. Insights gathered from over 30,000 contacts from customers, carers and advocacy groups to the Bank's Vulnerable Customer Unit have been used to design the hub and inform the services and resources that customers need most. On an ongoing basis, the Bank's Vulnerable Customer Unit supports families, carers and support workers, and those supporting international applicants, domestic violence shelters, the Irish Probation Service and TUSLA.

Third Party Risk Management and Supply Chain

- In 2024, the Group developed enhanced **Third Party Risk Management Technical Standards** which detail the mandatory requirements the Group must adhere to in identifying, documenting, and managing the risks associated with supplier arrangements including relating to Environmental, Social, Governance (ESG) risks. The Technical Standards include requirements for supplier relationship management and governance and onsite supplier control assessments are as means of additional assurance and risk mitigation.
- We further enhanced our [Code of Supplier Responsibility](#) and [Group Third Party Policies](#) in 2024 including requirements for suppliers to adhere to sustainable use of Artificial Intelligence (AI) as we recognise that while AI can support efforts to mitigate modern slavery risks, it can also pose risks to human rights including potential discriminatory practices.
- In 2024, we further refined our sourcing **Request for Proposal (RFP)** template suite to ensure that Sustainability, ESG and Human Rights are appropriately considered in our supplier engagement and selection process. Our RFP suite also contains links to our updated Code of Supplier Responsibility and Third-Party Policies for which all third parties are required to support before they can engage with the Group.
- We also enhanced our **contract templates** in 2024 in line with the latest regulatory requirements including requirements for compliance with Sustainability and Environmental, Social and Governance (“SESG”) laws, policies, regulations and standards as applicable to the supplier arrangement
- **Accelerated Payment Terms** –Our accelerated payments terms initiative for small and medium enterprises which accelerates our payment terms to 10 days was instigated in 2021 and continued in the period since including 2024.

Measuring Effectiveness – Key Performance Indicators

The Group did not have any severe human rights incidents connected to the Group (own workforce) in relation to cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises in the financial year-end 2024. The Group did not face fines, penalties, or compensation as a result of severe human rights incidents³, nor have there been any severe human rights incidents connected to Group supply chain reported to Group Procurement in 2024.

The Group recognises, however, that as we strive to enhance risk identification, due diligence, and collaboration in modern slavery risk management it is reasonable to expect that we may identify instances of modern slavery in our operations or supply chain in the future given its prevalence in wider society. We must then provide effective remedy when required to victims and survivors.

³ Severe human rights incidents are defined as cases of modern slavery, human trafficking, or child labour.

Key Performance Indicators	2024
% colleagues completed Sustainability at Bank of Ireland web-based training	95%
% colleagues completed Group Code of Conduct (includes Modern Slavery & Speak Up) web-based training	96%
% colleagues completed Financial Crime web-based training incorporating anti-money laundering, anti-bribery and corruption, sanctions	96%
% critical suppliers confirmed adherence to Group Code of Supplier Responsibility	98%
Reported Speak Up Modern Slavery Incidents	0

We have identified the **key performance indicators** above as a means of monitoring the effectiveness of the Group's measures to mitigate modern slavery risks. The Group has a programme of Group-wide web-based mandatory training in place. Our supplier contracts also obligate suppliers to provide training to the supplier personnel on Sustainability and ESG policies, procedures, and standards at regular annual intervals during the contract term. Group expectations regarding supplier training is also set out in [Group Third Party Policies](#).

The Group aims for 100% completion rates. Year-end completion rates reflect where colleagues were unavailable to complete training within the reporting period due to selected categories of leave. Colleagues are required to complete training as soon as possible on return to work.

Our focus in 2025 and beyond

The Group is committed to continuously improving human rights due diligence to align with the UN Guiding Principles on Business and Human Rights. The Group will continue to develop our approach to respecting human rights and mitigating modern slavery risks across a range of initiatives in 2025 to support further alignment with best practice in this area. We will continue to collaborate with a broad range of stakeholders and external groups and are committed to being open and transparent in our reporting and in our future modern slavery statements.



- **Strategy** - During 2025, we will refresh the Group's strategy for the forthcoming 2026 to 2028 cycle with our strategic focus continuing to build on the Group's long heritage and role in society. This will also drive an update to our 'Investing in Tomorrow' Sustainability Strategy.
- **Partnerships** - The Group will continue our key partnerships with Stop the Traffik (NGO pioneers in human trafficking prevention) 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.
- **Human Rights Monitoring Group & Training** - The Group will establish a human rights monitoring Group in 2025 tasked with oversight of Group human rights commitments and will provide annual mandatory training from 2025 for employees and business partners to promote understanding of human rights issues and the Group's Human Rights policy. Further detail is contained in the Group Human Right Policy published on our website at [Our Reports and Policies - Bank of Ireland](#).
- **Policy Review** - A review of key policies will be completed in 2025 to support embedding human rights commitments, and the Group will conduct regular assessments of human rights risks to ensure support of adherence to the policy across our workforce, customers, communities and suppliers. The Group will identify and assess adverse human rights impacts by establishing mechanisms to prioritise the real and potential adverse impacts on human rights.

- **Supply Chain** - The Group will continue to ensure alignment between supplier due diligence activity and the Group Financial Crime framework. This will include continued focus leveraging external independent ESG ratings to support enhanced insight on modern slavery and human rights in our supply chain. The Group will also complete a threat level assessment of sourcing, employment and grievance/speak-up practices of Group suppliers in higher risk sectors.
- **Reporting** - The Group will continue to publish metrics that support assessing the effectiveness of Group measures to mitigate the modern slavery and human trafficking risk and will develop our approach to measuring and reporting data related to Human Rights in 2025. We will also continue to publish our annual Modern Slavery & Human Trafficking Statements on the [UK Government Modern Slavery Statement registry](#) to support transparency in standards and modern slavery risk management practices in the Group. This follows publication of our 2023 and 2024 statements on the registry.

Governance & Approval

The Group Sustainability Committee (GSC), on behalf of the Board, is responsible for guiding the development and direction of the Group's Sustainability Strategy, ensuring it aligns with key stakeholder interests and recommending it to the Board for approval. The GSC also manages the execution of the Sustainability Strategy, reviews key sustainability policies, and ensures alignment with the Group's purpose and long-term success and, together with the Board Risk Committee oversees related risks, including monitoring the Climate Risk Implementation Plan.

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 2024. This Statement was approved by the Group Sustainability Committee under delegated authority of the Group Board on 20th May 2025.

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Myles O'Grady

Group Chief Executive Officer

20th May 2025