Bank of Ireland Group Modern Slavery & Human Trafficking Statement 2026

Bank of Ireland

1. About this Statement

This Statement sets out the steps taken by Bank of Ireland Group to prevent modern slavery and human trafficking in our operations and supply chain during the financial year ended 31 December 2025, pursuant to section 54(1) of the UK Modern Slavery Act 2015.

The statement applies to Bank of Ireland Group plc and its subsidiaries: 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".

As Ireland's National Champion Bank, we take our obligations in combating modern slavery and human trafficking risks seriously and are focused on delivering positive impact in this area. 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 is our ninth Modern Slavery & Human Trafficking Statement. We will continue to publish our annual statement on the UK Modern Slavery Statement Registry and on our website.

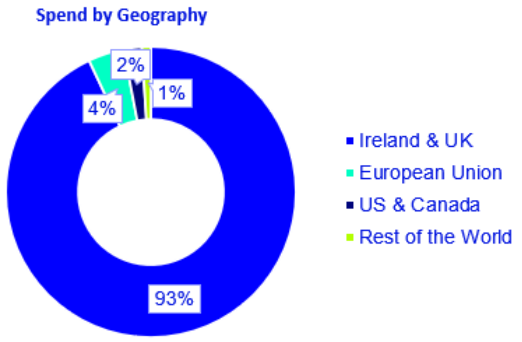
2. Our Organisation and Supply Chain

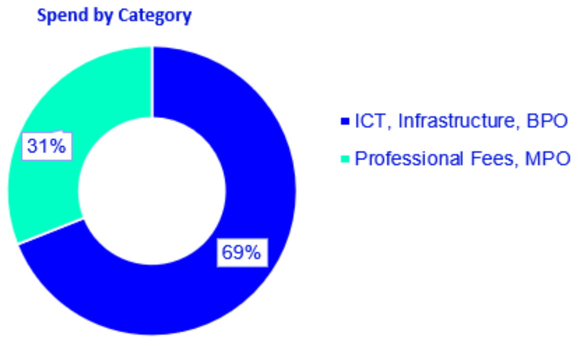
Our Business

Bank of Ireland Group is one of the largest financial services providers in Ireland with operations in Ireland and the UK, serving Retail, Corporate & Commercial, and Wealth & Insurance customers, supported by central Group functions. Bank of Ireland (UK) plc is the Group's wholly owned UK licensed banking subsidiary. The Group provides a broad range of banking and other financial services and reported total assets of €165bn as of 31st December 2025. The Group total employee headcount at the end of 2025 was 11,577 calculated based on the total number of active permanent and fixed-term employees at the end of the year. You can find out more about Bank of Ireland Group's trading divisions, performance, and a full list of Group products and services here. Further detail the Group's approach to Environmental, Social and Governance (ESG) risk management can be found in the Group Annual Report. (see Annual Report 2025).

Our Supply Chain

The Group transacted with approximately 1,800 suppliers in 2025. Our updated analysis of our supply base with reference to expenditure, geographical location, and service category highlights that the majority of these suppliers provide Information Communication Technology (ICT) / Technology services and professional services from locations categorised as low risk per the Global Slavery Index. Nonetheless 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.





A limited number of Group suppliers provide some elements of ICT services from India, Sri Lanka and the Philippines which are recognised as higher-risk locations for modern slavery. These suppliers are multinational companies and among our most strategic partners, and as such are subject to enhanced ongoing supplier relationship management, risk assessments and supplier due diligence by dedicated third party risk management teams within the Group. We leverage external real-time intelligence for offshore locations monitoring which includes ESG risk and modern slavery indicators as part of this enhanced oversight.

3. Policies and Oversight

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 updates these policies and statements, typically on an annual cycle, in line with our Group Risk and ESG Risk Management Frameworks.

Group Human Rights Policy outlines the Group's commitment to strictly prohibit all forms of forced labour, including modern slavery and human trafficking. The policy aligns with the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, Organisation for Economic Co-operation and Development (OECD) guidelines for Multinational Enterprises, International Labour Organisations Declaration on Fundamental Principles and Rights at Work.

Group Code of Conduct reflects our core values and competencies and sets outs the standards and behaviours required of all Bank of Ireland Group colleagues.

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.

Group Code of Supplier Responsibility sets out the key social, ethical and sustainability standards we expect from our suppliers, with section 6.1 outlining expectations in relation to Human Rights and Modern Slavery. It aligns with the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. Suppliers are expected to confirm compliance with this Code, which is in addition to obligations under supplier agreement(s) with the Group, applicable laws, regulatory requirements, and applicable Group policies.

Group Third Party Policies complements our Code of Supplier Responsibility and summarises internal Group policy statements into mandatory clear requirements that we expect Third-Party Suppliers to meet to ensure regulatory compliance, operational resilience, and our shared success. Third Party Policies also detail the standards we expect our suppliers to apply in managing their own suppliers (the Group extended supply chain).

Oversight

Oversight and approval of Group Modern Slavery and Human Trafficking Statement has been delegated by the Board to the Group Sustainability Committee, supported by Sustainability Decision Group, Group Executive Committee and the Group’s policy and control framework.

4. Our Modern Slavery Risk Assessments

We assess the Group's Modern Slavery risks based on sector characteristics, geography, and the nature of products/services involved:

- Third-party services: elevated risk in specific offshore ICT locations and selected facilities categories (catering, construction) due to country and sector factors.
- Clients, counterparties and assets: potential exposure through customers or investments operating in higher-risk sectors or jurisdictions, and financial-crime risks associated with trafficking proceeds.

5. Due Diligence, Controls and Remediation of Modern Slavery Risks

Business Customers due diligence

Our relationship managers are the primary point of contact for many of our business customers and are responsible for managing customers' adherence to applicable policies and procedures, including our sustainability risk policies. They are supported by Sustainability Leads established in every division of the Group. Bank of Ireland Corporate and Commercial has externally published a Sustainability Exclusion list clearly setting out our risk appetite for lending to potentially sensitive sectors which we believe cause environmental and/or social harm to society and our communities. Applying to all relationship-managed lending arrangements within the Corporate and Business Banking businesses, we will not provide financing to customers who are deemed to engage in this defined list of excluded business activities.

Assessments 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.

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. Our Supplier Criticality Methodology is used to determine the Criticality or Importance of the services from suppliers and the risks associated with suppliers. ESG risk considerations are included in the methodology.

Our suppliers are contractually bound to comply with applicable jurisdictional laws and to notify us of a breach of applicable laws or regulations. Suppliers are required to outline their practices and procedures to mitigate modern slavery risk within their own organisation and within their own supply chain. All suppliers are subject to onboarding and ongoing company financial and sanctions screening while additional and enhanced due diligence is completed for our higher risk suppliers. 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 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 to 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 latest 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.

Controls

Financial crime prevention: We maintain Anti-Money Laundering (AML) / Counter-Terrorist Financing / sanctions controls, trafficking typologies and suspicious activity escalation processes, and engage with external partners and industry initiatives, such as Stop The Traffik, to enrich intelligence and strengthen the detection and disruption of trafficking-related activity across our systems, processes and supply chain.

Remediation

Concerns can be raised via our Speak Up channel (as per our Speak Up Policy and Group Code of Conduct), Customer Complaints Process, or supplier points of contact. We investigate substantiated concerns and aim to remediate harms in collaboration with relevant parties; where remediation is not credible, we will consider suspension or exit.

6. Training and Awareness

We believe in continuous education and in ensuring that all employees are equipped with the right tools and training to be effective in their roles. To support this, the group provides annual training for employees and business partners to promote understanding of human rights, including modern slavery and human trafficking issues. This training is mandatory and must be completed each year by all employees. Colleagues are also expected to undertake regular, mandatory training on the following topic's which are directly or indirectly related to human rights, modern slavery and human trafficking: Group Speak Up, Inclusion & Diversity, Code of Conduct, Financial Crime, Privacy & Data protection & Group Sustainability training. Tailored training modules are delivered for higher-risk roles (procurement/TPRM, supplier relationship managers, AML investigators). The Board receives periodic ESG briefings. We will continue targeted training refreshers aligned to updated typologies and case studies.

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.

7. Effectiveness Monitoring (Key Performance Indicators)

We recognise the need to monitor the development of our approach to tackling modern slavery, and other human rights issues. We have identified the key performance indicators below as a means of monitoring the effectiveness of the Group's measures to mitigate modern slavery risks.

Key Performance Indicators	2025
% colleagues completed Sustainability at Bank of Ireland web-based training	97%
% colleagues completed Group Code of Conduct (includes Modern Slavery and Speak Up) web-based training	99%
% colleagues completed Financial Crime web-based training incorporating anti-money laundering, anti-bribery and corruptions, sanctions	97%
% critical suppliers confirmed adherence to Group Code of Supplier Responsibility	100%
Reported Speak Up Human Rights or Modern Slavery Incidents	0
Number of severe Human Rights incidents (cases of modern slavery, human trafficking, child labour) connected to the Group	0

In 2025 the Group did not face fines, penalties, or compensation as a result of severe human rights incidents, nor have there been any severe human rights incidents connected to Group supply chain reported to Group Procurement in 2025.

8. Our Progress in 2025

Supply Chain

The Group continued to ensure alignment between supplier due diligence activity and the Group Financial Crime framework. This included continued focus leveraging external independent ESG ratings to support enhanced insight on modern slavery and human rights in our supply chain.

The Group also completed a threat-level assessment of sourcing, employment and grievance/speak up practices of Group suppliers in higher risk sectors with a focus on catering and construction services. This assessment was subject to senior executive committee review and oversight in Q4 2025 with a commitment for further assessment and monitoring in 2026.

We refreshed our supplier risk mapping by geography, category and spend, with targeted enhanced checks for offshore ICT service providers and continued Supplier Relationship Management engagement.

We also continue to monitor that in-scope critical suppliers have published up to date Modern Slavery & Human Trafficking Statements.

Partnerships

The Group has been instrumental in the development of new technology designed to identify potential human trafficking red-flags in large data sets. We continued our partnership with Stop The Traffik (NGO pioneers in human trafficking prevention), Traffik Analysis Hub and Infinitech to evolve trafficking typologies and case studies used in training and investigation.

Training

Mandatory Human Rights Web based training module was launched for all employees to enhance internal capability and awareness in managing human rights-related issues.

Board ESG briefings and all-colleague sustainability training continued in 2025. Modern-slavery content was reinforced for higher-risk roles.

Human Rights

Human rights principles have been embedded into existing governance frameworks, ensuring alignment across risk and procurement standards. Existing grievance procedures were evaluated to ensure they remain accessible and effective. We are committed to independent and inclusive stakeholder engagement. During the year we held focused sessions with customers, non customers, community groups, NGOs, and colleagues to help inform and strengthen the effectiveness of the Group's approach to human rights and updated our policy as a result.

Reporting

At FY 2025, we reported on Corporate Sustainability Reporting Directive (CSRD) for the second year. Under CSRD we presented a comprehensive perspective on ESG topics, covering both the issues that affect the Group's business and those influenced by the Group's operations, including its entire value chain. We reported on our Human Rights processes and actions in the FY 2025 Annual Report.

9. Priorities for 2026

In 2026, the Group will continue to strengthen the effectiveness of its modern slavery and human trafficking due-diligence processes, supporting the **Resilient Company** pillar of our new 2026–2028 Group Strategy. Our focus will be on embedding stronger governance, improving risk visibility, and enhancing our operational response to Modern Slavery & Human Trafficking risks across the value chain. Key actions include:

- **Enhancing human-rights and Modern Slavery & Human Trafficking reporting and escalation**, supported by a new operating model and the introduction of a Human Rights flag in the new complaints system to ensure Modern Slavery & Human Trafficking related concerns are identified, escalated, and addressed promptly and consistently.
- **Deepening integration of Modern Slavery & Human Trafficking risk within Third-Party Risk Management**, including the use of external supplier ESG risk ratings and continued alignment with the Group Financial Crime Framework. In 2026, we will deliver **targeted Modern Slavery & Human Trafficking related training** for colleagues managing higher-risk suppliers and service categories.
- **Strengthening intelligence-led prevention**, through continued partnerships with Stop the Traffik, Traffik Analysis Hub and Infinitech, enhancing our ability to detect and mitigate trafficking-related indicators across both our supply chain and customer activities.
- **Maintaining transparency and compliance**, through annual publication of the Modern Slavery & Human Trafficking Statement on the Group website and the UK Government Modern Slavery Registry, reinforcing our commitment to responsible and ethical business practices.

These priorities directly support our 2026-2028 Sustainability Strategy - particularly the **Supporting Social Inclusion** pillar — by promoting responsible sourcing, safeguarding vulnerable workers, and strengthening the systems and controls that underpin trust, resilience, and long-term value for customers and communities.

10. Approval and Sign-off

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 2025. This Statement was approved by the Group Sustainability Committee under delegated authority of the Group Board on 23rd April 2026.

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Myles O'Grady
Group Chief Executive Officer
Bank of Ireland Group plc

23/04/2026