

Slavery and Human Trafficking Statement -- year ending 31st December 2018

Introduction

This is a slavery and human trafficking statement by ABC International Bank Plc ("Bank ABC") for the financial year to 31st December 2018.

The Modern Slavery Act 2015 makes it a crime to subject people to slavery, servitude, forced or compulsory labour, or human trafficking ("modern slavery").

Bank ABC adopts a zero tolerance approach to involvement in modern slavery or human trafficking. Whilst the nature of Bank ABC's business means that there is a low risk of becoming involved in these crimes, the Bank takes measures to ensure that neither we nor any of our suppliers subject anyone to modern slavery. We will terminate our relationship with any supplier that we identify as being involved in modern slavery.

Our Business Structure

Bank ABC is registered in England and is a wholly-owned subsidiary of Arab Banking Corporation (B.S.C.), a bank based in Bahrain. We offer trade finance, real estate finance, Islamic financial services and treasury services.

At the date of this statement we have approximately 250 permanent staff across our head office in London, our branches in France, Germany and Italy, and our representative office in Turkey.

Our supply chain covers a range of products and services including information technology equipment and services, insurance, building maintenance, security, cleaning and catering.

Risk Assessment

During 2018 we performed a review of our supply and outsourcing arrangements, which included an assessment of related modern slavery risks. We see our risk of directly employing victims of modern slavery as low. Of our main suppliers, most do business in the UK or Europe, or offer low-risk products or services. Some suppliers are located in higher-risk countries or offer higher-risk services such as security, cleaning and catering.

What we do in relation to our Staff and Supply Chain

When hiring new staff we only make use of reputable recruitment agencies, who provide the necessary assurances and checks on candidates. We further undertake our own checks, including document checks and ensuring candidates are aged 16 or above. We pay our staff appropriate market salaries and rewards, plus other benefits including health and welfare options.

The contracts with our security and cleaning service providers in our London head office were amended in 2018 to ensure that the staff employed by those companies are paid at least the London Living Wage.

We have a code of conduct and whistleblowing policy under which our staff are required to report any knowledge or suspicion of criminal activity or other wrongdoing, including modern slavery.

Training, Awareness and Development

April

During 2018 we reminded our staff of the existence and consequences of modern slavery, that we expect them to have no part in it, and that they should report any knowledge or suspicion of modern slavery through our whistleblowing procedure. A section on modern slavery is included in our Financial Crime training programme, which is mandatory for all staff. We have provided additional guidance to staff directly involved in procurement to help them reduce the risks of modern slavery in our business and supply chain.

This statement was approved by the Board of ABC International Bank plc on 5th March 2019.

Rajeev Adrian

(Director)

David Holden

(Company Secretary)

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