



## Who we are

We are a leading international banking group, with a presence in 60 of the world's most dynamic markets. Our purpose is to drive commerce and prosperity through our unique diversity, and our heritage and values are expressed in our brand promise, Here for good. We provide a wide range of banking and financial products and services to personal and business clients, serving four client segments:

- **Corporate & Institutional Banking**
- **Commercial Banking**
- **Private Banking**
- **Retail Banking**

We achieve this via more than 84,000 colleagues and 10,000 non-employed workers, spread across our markets. A significant majority of those working for us are skilled professional workers.

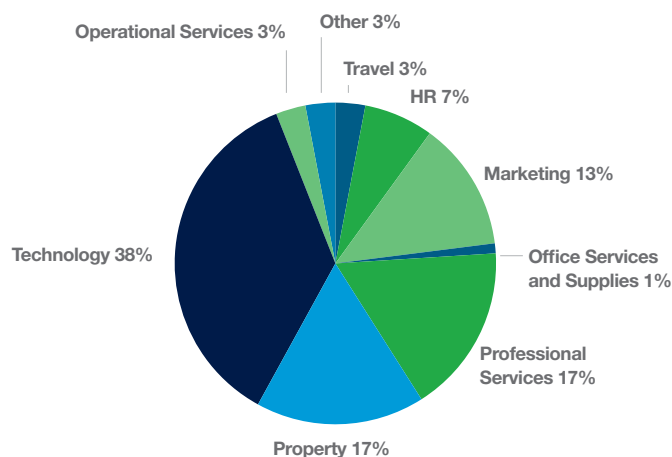
We had around

# 14,600

active suppliers in 2019

We spent around USD 4.0bn in 2019 with around 14,600 active suppliers. We source from all countries in which we operate. The majority of our expenditure is indirect; goods and services that enable our core provision of financial services, rather than goods for resale. We have no inherent seasonality in our sourcing; either in variation of the goods and services we source or the suppliers from whom we source.

Our spend covers the following categories:



## How we consider modern slavery and human trafficking (MSHT)

### Respecting human rights

We seek to ensure human rights are respected in all aspects of our activities. Through due diligence we seek to avoid infringements or complicity in the infringements of others, and take steps to address adverse impacts if they occur.

Our Position Statement on Human Rights ([sc.com/humanrights](https://www.sc.com/humanrights)) was developed following engagement with a range of external stakeholders including expert practitioners and civil society organisations. It was approved by our Group Chief Executive in May 2016 (and will be reviewed during 2020) and is informed by a range of international standards including:

- International Bill of Human Rights, comprising:
  - United Nations (UN) Universal Declaration of Human Rights
  - International Covenant on Civil and Political Rights
  - International Covenant on Economic, Social and Cultural Rights
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- International Labour Organisation (ILO) Conventions 138 (Minimum Age) and 182 (Worst Forms of Child Labour)
- UN Guiding Principles on Business and Human Rights (the 'Ruggie Principles')
- United Nations Global Compact
- Thun Group of Banks - The Guiding Principles: an interpretation for banks
- International Finance Corporation (IFC) Performance Standards

Where we identify that we have caused or contributed to adverse impacts, we endeavour to address these by providing remedy or cooperating in the remediation process.

Our Group-wide Code of Conduct ([sc.com/codeofconduct](https://www.sc.com/codeofconduct)) reflects our commitments on human rights, confirming that;

**“We respect human rights impacted by our activities with colleagues, suppliers and clients. Where adverse impacts occur, we are committed to addressing these”.**

All colleagues commit to, and undertake online training on, our Code upon joining Standard Chartered and recommit to it annually.

Standard Chartered's Speaking Up Programme has been established for use by internal and external parties to report actual, planned or potential misconduct on the part of Standard Chartered, its staff, suppliers and subcontractors. Third parties can report relevant information in confidence by using a secure web-based channel ([www.intouchfeedback.com/speakingup](https://www.intouchfeedback.com/speakingup)). The website accepts reports in 13 languages. Reports may also be made anonymously. Reports are investigated by Standard Chartered in strict confidence. The Speaking Up Programme is overseen by Senior Management and all line managers are required to complete training on the programme.

We communicate our Speaking Up programme to our suppliers through our Supplier Charter, and we encourage our suppliers to raise awareness of the programme among their colleagues. During 2019 no cases were brought to our attention through this route.

## Tackling MSHT

Through slavery, servitude, forced or compulsory labour and human trafficking, MSHT breaches fundamental human rights. Our roles as an employer, procurer of goods and services and provider of financial services each provide potential exposure to these practices. Our broad footprint and our capabilities particularly in respect of fighting financial crime gives us the opportunity to raise awareness of, and take steps to tackle, MSHT in a wide range of markets and industries.

We seek to ensure there is no MSHT in our operations and supply chain, and to identify and address MSHT risks connected to our provision of financial services. We recognise this is an ongoing process, as evidenced by our 2019 actions and 2020 commitments detailed under the 'Learning and improving' sections in this document.

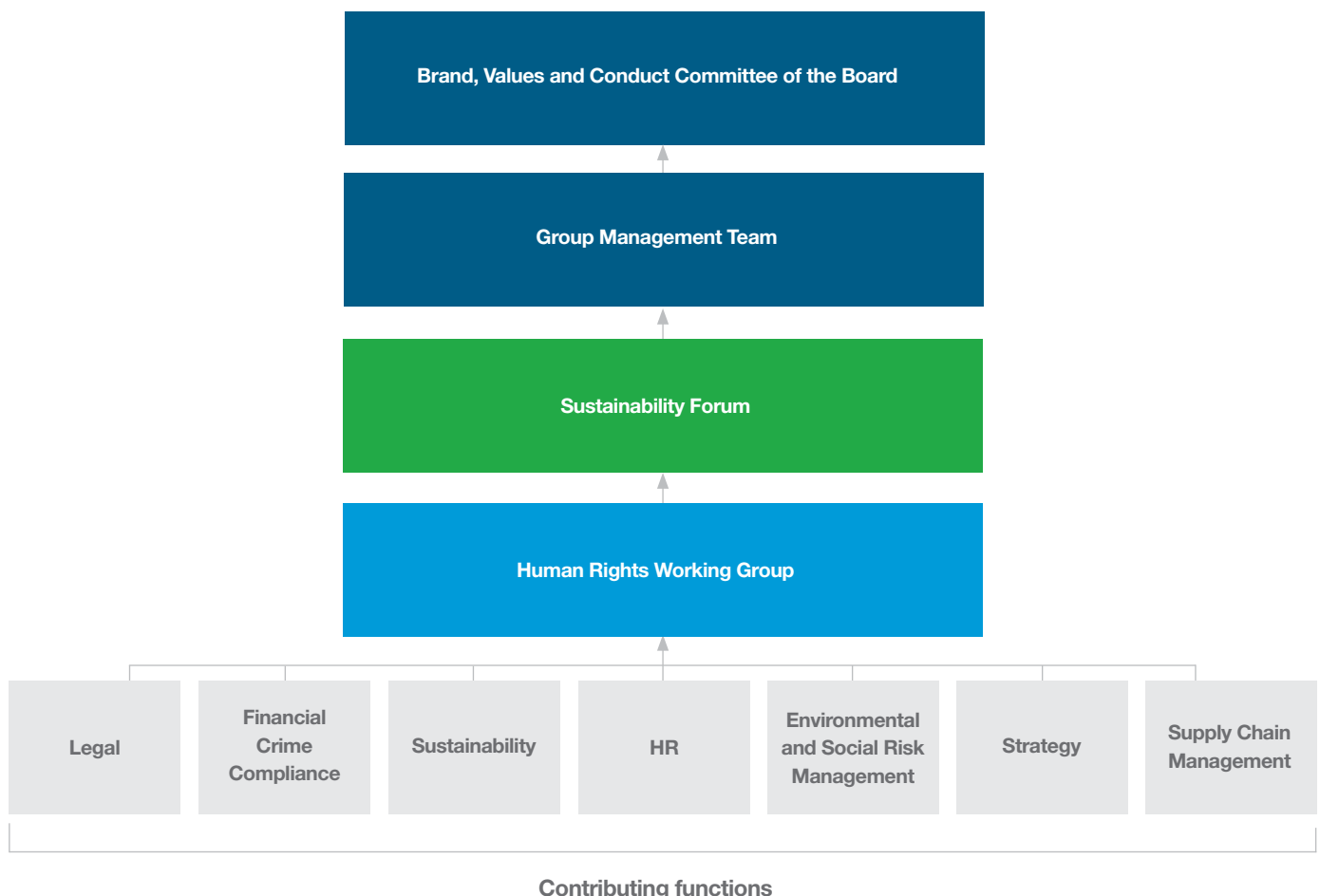
## Learning and improving

We recognise the importance of a joined-up approach to addressing MSHT across the organisation. During 2016 we created an organisation-wide MSHT working group. In 2017, this working group carried out a review of our salient MSHT issues and the controls we have in place to guard against negative impacts on people. This included an assessment of country-level MSHT risks in all the markets in which we operate, and how our role as an employer, procurer or financier may connect us to these risks. We detail in the following sections how we have taken forward the outcomes from this assessment during 2019.

In 2018, the working group's remit expanded to become a Human Rights Working Group, which reports to our Sustainability Forum. In turn, the Forum provides periodic updates to our Group Management Team, and Brand, Values, Conduct and Culture sub-committee of the Board.

We also participate in informal discussions with other banks and stakeholders, including hosting workshops, to share experiences, best practice and enhance our knowledge of MSHT controls and reporting.

## Human Rights Working Group Reporting Lines



## How we approach MSHT with clients

We recognise the role the financial services sector can play in fighting MSHT. One such role is using our anti-money laundering capabilities to identify and report the illicit finances that facilitate and drive the unlawful business model of exploitation.

One of our objectives as a bank is to support partnerships that fight financial crime ([sc.com/fightingfinancialcrime](https://sc.com/fightingfinancialcrime)). Since 2014, we have worked to encourage a more coordinated industry approach to the role of financial institutions in identifying and disrupting financial flows linked with MSHT. Examples of this include our:

**Participation in the Joint Money Laundering Intelligence Taskforce (JMLIT)** - the UK's model for a collaborative approach to tackling money laundering, through a partnership between the UK government, law enforcement agencies and members of the financial sector. We chair the JMLIT's Expert Working Group (EWG) on Human Trafficking and Organised Immigration Crime, through which we encourage stronger cross-sector partnerships and drive an improved understanding of how financial institutions can disrupt the illicit finances that underpin this criminal business, including developing guidance and materials for wider use. In 2019, we authored an industry alert on behalf of the EWG on how fraudulent documents are an enabler and hosted the National Crime Agency (NCA)'s Invisible People exhibition at our offices in London, described further in the case study below.

**Contribution to other industry initiatives that help develop industry good practice.** This has included working closely with NGO The Mekong Club to develop the Thomson Reuters Foundation's Banks Alliance Against Trafficking Asia-Pacific Whitepaper; hosting industry events in multiple locations across the globe; publishing materials to raise awareness on [sc.com](https://sc.com); delivering training to law enforcement on the value of financial investigation in countering human trafficking; and joining panel discussions such as the Asia-Pacific Group on Human Trafficking and People Smuggling (Bandung, Indonesia), the US Treasury's Partnership to Combat Human Trafficking (Washington DC), and the US Securities Industry and Financial Markets Association's (SIFMA) Anti-Money Laundering and Financial Crimes Conference.

**Efforts to raise awareness of how financial institutions can detect and disrupt the finances related to MSHT** through our programme of Correspondent Banking Academies (CB Academies) ([sc.com/fightingfinancialcrime/industry.html](https://sc.com/fightingfinancialcrime/industry.html)). In 2019, we delivered content on modern slavery and human trafficking in three countries (Pakistan, Vietnam, Cambodia).

In addition to prohibiting relations with parties known or reasonably suspected to be involved in organised crime including human trafficking, our customer due diligence procedures include requirements to determine the nature of a client's business activities and source of funds/wealth, and media screening of our clients to identify any potential connections to criminality including human trafficking.

We have long-standing environmental and social standards in place for business clients ([sc.com/policiesandprocedures](https://sc.com/policiesandprocedures)). These set clear expectations requiring clients to have appropriate controls in place to prevent modern slavery practices.

Further, we embed these standards via our systems and practices; for example in our trade finance systems we undertake automated screening of Letter of Credit trade financing, to identify where either the applicant or beneficiary of financing is operating in a high-risk country / commodity combination, using information sourced from the International Finance Corporation (IFC) / and World Wildlife Fund (WWF)'s Global Map of Environmental and Social Risks in Agro-Commodity Production (GMAP). A report is generated monthly to provide post-transaction screening across all global markets for high-risk combinations; this is used to help support our client due diligence and consider whether they have reasonable controls in place to manage risks including modern slavery.

Where we identify, or others bring to our attention, that MSHT practices are or may be occurring, we will investigate and work with our clients to ensure they are able to rectify these and prevent recurrence ([sc.com/eandsrisk](https://sc.com/eandsrisk)). Where we cannot get the necessary level of comfort that sufficient safeguards are in place, we will exit the client relationship and have done so on occasion in the past. Our relationship managers receive training via a variety of methods including face-to-face, webinar and online, to help them engage with clients. In 2019, we trained 1,126 staff on environmental and social risk management.

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## Case Study: Raising awareness of modern slavery

**The 2019 UK Anti-Slavery Day was held on 18th October 2019. To mark the occasion the Bank hosted the NCA's Invisible People Exhibition which raises awareness of the signs of Human Trafficking and Modern Slavery, where the victims are often “hidden in plain sight”.**

The exhibition commenced with a launch event, where delegates heard from internal speakers and representatives from law enforcement and NGOs on the value of partnership in tackling this abhorrent crime. The UK Anti-Slavery Day embodies the spirit of Partnership, typifying our approach to partnering the lead in the fight against financial crime and specifically to do all we can to raise awareness and combat Human Trafficking and Modern Slavery. Financial institutions can support efforts to disrupt the Organised Criminal Gangs profiting from this activity

through strategic partnerships, information sharing agreements and thorough financial investigations. Our awareness and training (including via e-learning) educates our staff to identify the signs of human trafficking not only in their work but, through initiatives such as the hosting of the Invisible People Exhibition, in their private lives as well.



## Case study: Identifying MSHT-linked money laundering

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Standard Chartered, and other banks worked together to identify the proceeds of Modern Slavery and Human Trafficking for a case which involved accounts in Malaysia for a female Ukrainian national who utilised a New Zealand address. This was flagged because of the high-value incoming payments originating from an account in the United Arab Emirates (UAE) which far exceeded her declared income. A deep dive transactional review found that the accounts had been used to launder funds, using inter-account movements, layering and the general obfuscation of the trail of funds to move money internationally between the UAE, Thailand, Malaysia, Hong Kong and New Zealand. These are high-risk countries for human trafficking and there is a known corridor from the ASEAN and South Asia region to the Middle East, where victims may be forced to work in the construction and sex industries. The work led to regulatory reporting in a number of jurisdictions.

The financial indicators of MSHT are quite well-developed for general view, particularly for victims exploited in Western Europe and North America. Standard Chartered Bank contributed to sessions and training by providing a number of customer and transactional red-flags that are associated to ASEAN and South Asia MSHT cases, furthermore, a full working list of red-flags were provided by Asia Pacific Banking Alliance to members of Financial Institutions for reviews and dissemination. A white paper comprising all of the red-flags and typologies was also shared amongst Banking Alliance members. This is an example of how the Bank is working to combat MSHT as well working with community partners to learn from typologies and help promote wider awareness of these cases.

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## Case study: Kuwait oil refinery and labour risks

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In 2018 Standard Chartered acted as lender and Global Environmental bank on a transaction in Kuwait involving the upgrade of an oil refinery. The environmental and social lender requirements included implementing a comprehensive action plan around ensuring worker rights and welfare, to address the key risk identified during the impact assessment stage related to a peak construction workforce of c.55,000 primarily migrant labourers. Risks identified were in relation to endemic practices such as passport retention, charging of recruitment fees, poor accommodation and food quality, fire safety in worker accommodation, worker grievance mechanisms, and general contractor management.

2019 brought challenges in compliance with some of the actions due to the scale of the work being undertaken and the ambitious timescales for completion, including not limiting working hours and ensuring proper rest days in line with national law. Standard Chartered continued to engage actively with the client, including several face to face meetings with them and conducting an extended site visit program to ensure that adequate provisions were made to address areas of weak compliance and ensure continued alignment with international standards. The project is now being considered as a 'best practice' example by the national energy ministry to showcase environmental and social risks management.



## Learning and improving

Our review of MSHT risks and controls during 2017 identified areas where we could enhance our response. We have taken action on a number of these, whilst some will take longer to address.

### During 2019 we:

- Continued our programme of training and capacity-building among frontline and credit staff to support them in identifying potential MSHT risks
- Undertook a review of the new OECD 'Due Diligence for Responsible Corporate Lending and Securities Underwriting', to benchmark our current practice against new expectations for managing adverse impacts related to MSHT and identify where Standard Chartered could strengthen our approach. Work is being overseen by the Group Reputational Risk Committee
- Updated our Environmental and Social Risk Assessment (ESRA) due diligence question specific to Modern Slavery in high risk sector/country combinations
- Following a review of approaches taken by peers, amended our Global Banking / Corporate Banking client on-boarding agreements (the 'Regulatory Compliance Statement') to establish alignment with the Group's Position Statements (including our client standards on Modern Slavery and Human Trafficking) in order to enhance our leverage in working with clients to uphold human rights
- Delivered two Modern Slavery specific trainings in Nigeria in December 2019
- Included a modern slavery component in all in-person Environmental and Social Risk Management (ESRM) trainings conducted in 2019
- Updated our ESRM e-learning to include a Modern Slavery component

### During 2020, we will:

- Continue our campaigns to raise awareness amongst our staff of the financial indicators linked with MSHT to support them in identifying the latest typologies and potential risks
- Attend and speak at industry events and banking forums to raise awareness of, and encourage shared action on, MSHT
- Explore the use of new approaches to detect MSHT by combining data and analytics with outreach to civil society, financial institutions, and the public sector
- Continue training on MSHT through the ESRM e-learning and team training schedule
- Review the bank's grievance mechanisms in line with the new OECD Guidance on responsible business conduct which was published at the end of 2019
- Continue to develop internal systems used to log, track and monitor issues related to MSHT in our clients and transactions
- Undertake a 'deep dive' into salient sector-based human rights issues, such as worker welfare in the Middle East construction sector or the potential for human rights infringements associated with the growing sophistication of surveillance equipment. Findings of this work will inform our approaches to clients operating in sectors affected by these particular human rights challenges, and may lead to additional engagement on these salient issues to ensure

## How we address MSHT with suppliers

Standard Chartered does not knowingly participate in relationships with suppliers involved in MSHT. We expect all our suppliers to comply with our Supplier Charter ([sc.com/suppliercharter](https://sc.com/suppliercharter)), and to apply its principles within their sphere of influence such as approved subcontractors. The Charter includes requirements on suppliers to:

- Work to support and respect the protection of human rights in accordance with the UN Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights
- Prohibit human trafficking, the use of all forms of forced or compulsory labour and any other form of modern slavery within the supplier's own operations
- Recognise and conform with the rights of colleagues to associate freely and to organise and bargain collectively in accordance within the framework of local laws in which they are employed, recognising the role of International Labour Organisation (ILO) Conventions 87 on freedom of association and 98 on right to organise and collective bargaining
- Not use child labour and to support effective abolition of child labour, and to take all reasonable steps to eliminate such labour from their supply chain, recognising the role of ILO Conventions 138 on minimum age and 182 on child labour
- Take all reasonable steps to eliminate forced labour from their supply chain, recognising the role of ILO Conventions 29 and 105 on forced labour

**All suppliers are required to agree to our Supplier Charter as part of registration, and this is reinforced through a mandatory contract in our supplier contract templates introduced in 2017. Our Supplier Charter is shared with all suppliers on an annual basis.**

For tendered initiatives, we screen potential suppliers to ensure they have approaches in place to address modern slavery, which may include issuing a modern slavery statement. A supplier's response forms part of our overall evaluation criteria, informing our decision on whether to do business with them.

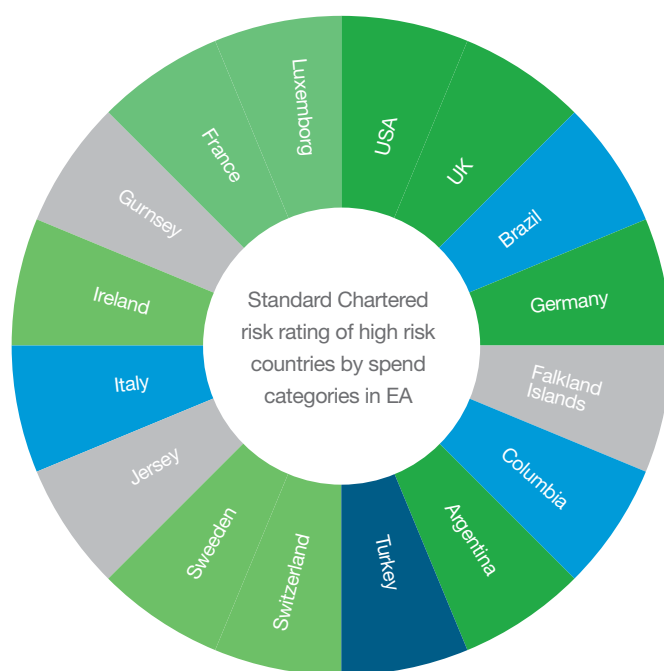
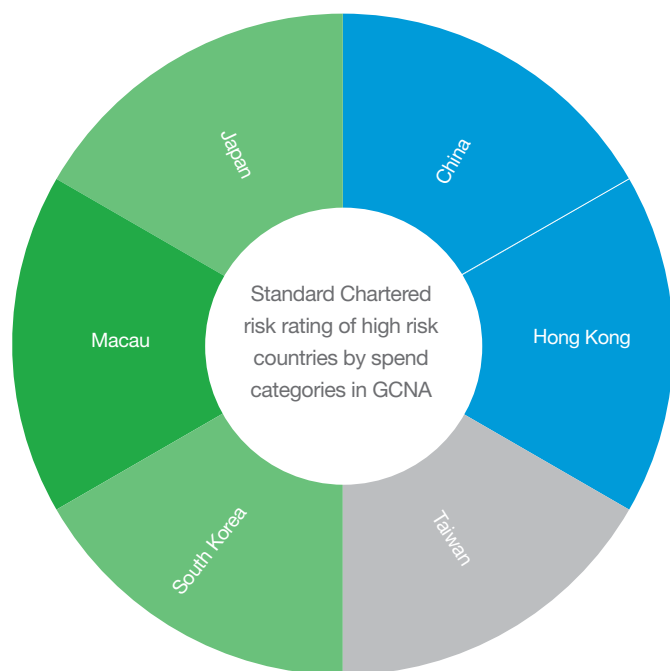
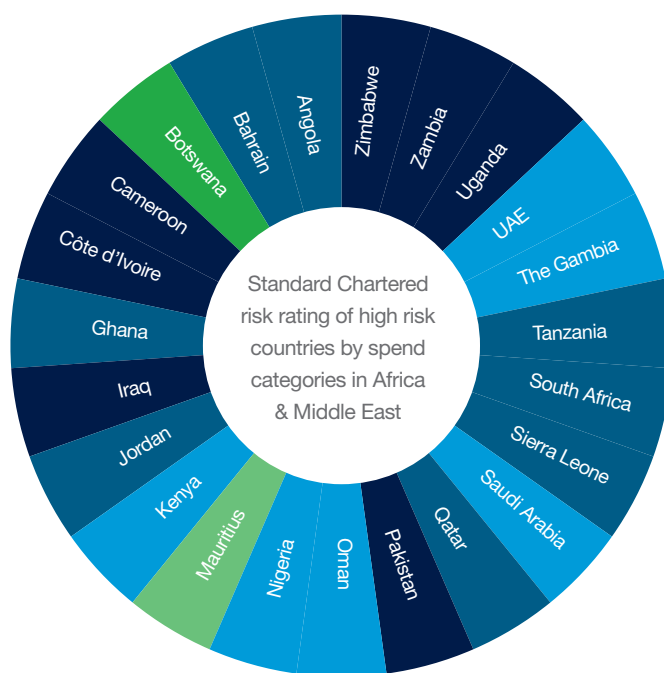
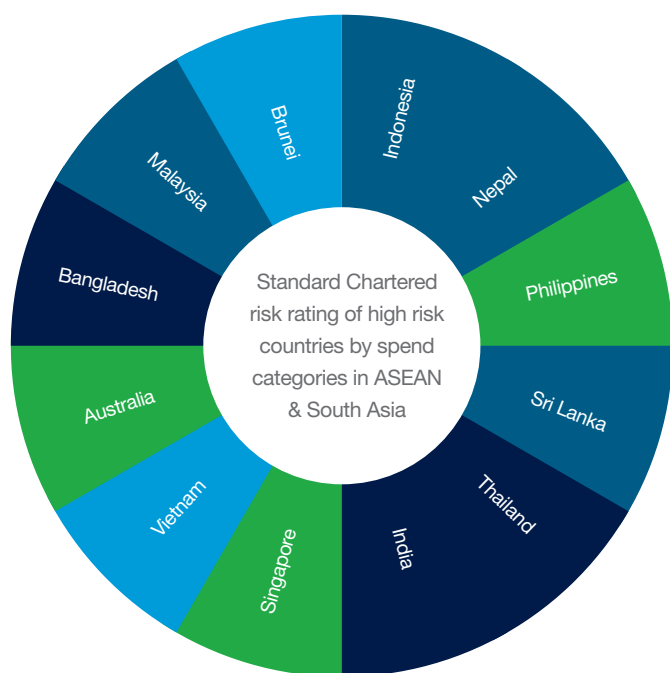
Our standard contracts contain rights to conduct routine monitoring of suppliers. Those found non-compliant with our standards may face termination of contracts and be excluded from potential engagement opportunities. During 2019, we conducted a monitoring assessment of our strategic suppliers.



# 2019 Modern Slavery Statement

In 2017, with support from external specialists on human rights and labour practices, we mapped all our global spend to identify specific geographies and spend categories which may require enhanced oversight. This information has been used to help us conduct social compliance audits on a sample of suppliers operating in higher-risk geographies and sourcing

categories during both 2017 and 2018. In 2018 we decided to expand the scope of our audit to the wider topic of health and safety, labour practices, fair wage and MSHT. We also used the mapping to support dialogue within our regional Supply Chain Management structure, such as with ASEAN and South Asia, and Africa and the Middle East:



Very high   High   Medium   Low   Very low

Risk rating is based on an internal scoring methodology using indicators grouped into three core areas; structural factors associated with vulnerability, governance and regulatory environment, and known risks in practice.

## Learning and improving

Building on our actions in previous years, we took further steps during 2019 with the long-term objective of eradicating MSHT from our supply chains:

### During 2019, we:

- Created a Supply Chain Management Sustainability Working Group that included participants from across the Bank's footprint, responsible for implementing our Modern Slavery commitments and reviewing practices and issues for continued improvement
- Conducted a targeted education session on Modern Slavery risk for our 'Category leads' (our internal specialists who lead our category strategies) responsible for managing spend in categories with heightened risk to modern slavery
- Assessed our 'strategic suppliers' on their Modern Slavery statements and practices through a sustainability questionnaire and received positive confirmation that our strategic suppliers have statements on Modern Slavery. We have identified one supplier that we will engage and aid to improve their response in 2020
- Reviewed our internal sourcing, contracting and supplier risk system (SCBuy) and identified opportunities to leverage existing processes to better identify, assess and manage modern slavery risk. Structural and technical enhancements will be delivered as part of our 2020 plan
- Conducted a proof of concept of a software solution that helps trace and monitor social risks at all levels of the supply chain. The purpose of this was to help the Bank improve the identification of its Supply Chain modern slavery risk while also further educating our Category leads through specific modern slavery risk dashboards
- Appointed a Modern Slavery 'Risk Owner' for Supply Chain Management and integrated our Supplier Modern Slavery governance framework within the Group's Risk Management Framework under Enterprise Risk Management
- Reviewed our Supplier Charter to consider updates to enhance language on recruitment practices and fair pay and ensure it continues to be aligned with our expectations on our suppliers and subcontractors with regards to human rights and labour practices

### During 2020, we will:

- Continue to improve our supplier sourcing and selection processes by:
  - Enhancing our SCBuy Engagement Request (ER) to help identify supplier engagements with spend categories with heightened risk of Modern Slavery
  - Develop a Modern Slavery supplier control assessment where specific questions are answered and evaluated as part of the selection process for suppliers with a heightened risk
  - Finalise first and second line responsibilities and governance framework for managing and controlling supply chain Modern Slavery risk
- Ensure Supply Chain Operational Risk Framework is enhanced to include Modern Slavery risk and agree on approaches to ongoing assurance.
- Review and improve our Third-Party Risk Management Standards, to reflect our new treatment of Modern Slavery
- Assess how we can leverage SCBuy for the remaining supplier population, to support identification and management of modern slavery risks and develop relevant key risk indicators for measurement

Standard Chartered recognises the importance of working with other financial institutions and affiliates on combating MSHT within the supply chain. We therefore will seek to continue to collaborate with others on best practices such as via inter-bank discussion groups, with a view to progressing further our plans on MSHT.

## How we address MSHT with our workforce

Our workforce includes colleagues employed directly by Standard Chartered, and non-employed workers who are contracted through third-parties. We address MSHT with non-employed workers through measures taken with respect to our supply chain, as outlined above.

We maintain and assure policies and procedures which set out how we engage with direct colleagues through hiring, throughout their career and upon leaving Standard Chartered, which include measures that seek to ensure no employee of Standard Chartered is a victim of MSHT practices through their employment.

Our Fair Pay Charter, launched in 2018, supports our commitment to deliver fair and competitive remuneration to all colleagues. The Charter clearly sets out the principles we use to guide reward and performance decision-making globally, including commitments around how we set, structure and deliver remuneration.

In line with the Charter and with the support of an external NGO, we implemented in 2019 a global living wage framework for all employed workers. We maintain compliance with living wages through our hiring and pay review processes. We are mindful that changes in economic conditions can rapidly increase the cost of goods and services. We therefore monitor changing conditions throughout the year to ensure that our commitment remains appropriate, and where required, we provide additional monetary interventions outside of our annual pay review cycle.

A feasibility analysis to establish the extent to which we can extend our living wage commitment to non-employed workers and other third parties is in progress and will continue in 2020.

We have clearly defined processes in place, including our Speaking Up program, to enable colleagues to raise and resolve grievances connected directly with their employment, and have implemented fair and consistent standards where the conduct or performance of colleagues fails to meet expected standards.

Further information on our alignment to the Fair Pay Charter and on how we engage colleagues on fairness, can be found in our Fair Pay Report ([sc.com/FairPay](https://www.sc.com/FairPay)).

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## Supporting shared action

Standard Chartered acknowledges we cannot tackle MSHT on our own. Our actions detailed above show how we work with those we have a direct relationship with, and we also promote shared action through collaborative platforms. These include:

| Organisation  | Basis for partnering  | Progress in 2019   |
|---|---|--|
| <b>Thomson Reuters Foundation – Banks Alliance</b><br><br>The Banks Alliance was established by the Thomson Reuters Foundation, the philanthropic arm of Thomson Reuters, in recognition of the key role that financial institutions can play in the fight against human trafficking. | Through the Banks Alliance, we can enhance our own understanding of the financial indicators associated with MSHT, share our knowledge with other participants, and help mobilise wider industry action by illustrating the role that banks can play in tackling MSHT.  | We remain committed to the Banks Alliance. In 2019 we were key contributors to a new white paper for Asia-Pacific (published in February 2019) and a core member in shaping the newly reformed European Banks alliance and its objectives for 2020.  |
| <b>Roundtable on Sustainable Palm Oil (RSPO)</b>  | As an active member of the Round table for Sustainable Palm Oil (RSPO) Standard Chartered were approached in 2018 to become a member of the Complaints Committee, a non-judicial grievance mechanism designed in line with the requirements of the UNGP to provide a framework to address complaints against any RSPO member. An increasing proportion of these complaints involve infringement of individual, workers or communities' rights and involve significant risk factors for forced labour. | Standard Chartered was approached in November 2019 to take up a seat on the Board of Governors as the Financial Institutions representative. The Board of Governors is tasked with oversight and strategic governance of the RSPO and is supported by a secretariat and general assembly. In this role SCB will continue to promote awareness and remediation of MSHT issues within the palm oil supply chain. |
| <b>CDC</b>  | CDC has a long-standing relationship with Standard Chartered sharing knowledge on a number of risk areas common to both institutions such as managing risks of MSHT. CDC recently brought out a 'Good Practice Note on Managing Risks Associated with Modern Slavery' and continues to work with Standard Chartered to better understand MSHT risks in our shared geographies.  |  |

### Thun Group

The Thun Group is an informal group of banks who work together with the purpose of understanding how human rights can best be respected and promoted across the breadth of different banking activities.

Standard Chartered has been a participant in the Thun Group since 2013. At the annual in-person Thun Group meeting in 2018, it was agreed to form a 'core group' to facilitate the Group's activities and discussions, and Standard Chartered became a member of this core group.

| Organisation   | Basis for partnering   | Progress in 2019  |
|--|--|---|
| <p><b>NGOs and Civil Society</b></p> <p>Our key partners in 2018 included the Mekong Club, Liberty Shared, Stop the Traffik, Sentry, RUSI and C4ADS.</p> | <p>The focus of our engagement with NGOs and other civil society stakeholders on MSHT has been to inform our financial crime fighting work; we also seek opportunities to inform our wider programme on MSHT.</p> <p>We are proud to work alongside several leading NGOs that help strengthen our understanding of the financial flows associated with MSHT, for example any geographic or sector specific characteristics. In turn, we encourage them to consider financial indicators in their analysis and reports.</p>   | <p>Our work in 2019 included hosting industry events in London and New York; publishing materials to raise awareness on sc.com; delivering training to law enforcement on the value of financial investigation in countering human trafficking; and joining panel discussions such as the Asia-Pacific Group on Human Trafficking and People Smuggling.</p> <p>In the Americas, Standard Chartered participated in multiple panels including a broad range of participants such as NGOs, financial institutions, and government partners at the first ever U.S. Treasury's Partnership to combat Human Rights Abuse &amp; Corruption event (Washington DC), presenting lessons learned on information sharing models to fight Human Trafficking and collaboration with NGO partners.</p>  |
| <p><b>The UK's Joint Money Laundering Intelligence Taskforce (JMLIT)</b></p>   | <p>JMLIT is one of several financial crime-fighting financial information sharing partnerships (FISPs) in which we participate.</p> <p>JMLIT provides a framework for exchanging knowledge on key financial crime threats, including MSHT. It helps us enhance our effectiveness in combating financial crimes by improving our understanding of their financial characteristics. It also helps us play an active role in raising awareness among other financial institutions, law enforcement agencies and government bodies of the role that financial institutions can play in countering MSHT.</p> <p>JMLIT was described in 2018 by the Financial Action Task Force as "innovative" and an "example of best practice".</p> <p>We chair the JMLIT's Expert Working Group (EWG) on Human Trafficking and Organised Immigration Crime (HT &amp; OIC) and, as such, play a leading role in bringing together representatives from the public and private sectors to build and share knowledge, and help the financial industry take more effective action against MSHT.</p> <p><a href="https://sc.com/fightingfinancialcrime/partnerships.html">sc.com/fightingfinancialcrime/partnerships.html</a></p> | <p>In our role as Chair of the JMLIT EWG on HT &amp; OIC, we have helped drive a collective industry response to MSHT, including taking the following steps:</p> <ol style="list-style-type: none"> <li>We have developed the Group's forward work plan, for the first time more closely aligning intelligence needs of public and private sector to identify Organised Criminal Networks involved in human trafficking.</li> <li>The Bank has led on publishing a JMLIT alert on the use of Fraudulent Documents in Modern Slavery, Human Trafficking, and Organised Immigration Crime and is preparing awareness material on Modern Slavery in the Waste Industry.</li> <li>In our role as Chair of the Group we continue to broaden awareness of the role of Financial Information Sharing Partnerships in combatting human trafficking. Actions to support this include training law enforcement in the UK and internationally, as well as with financial institutions in other markets.</li> </ol> |

## Measuring our progress

We measure how we perform against our standards in a number of ways. This includes monitoring:

| Measure  | 2019 Result   | 2018 Result  |
|--|---|--|
| Completion of our mandatory eLearning on anti- money laundering, which contains materials on human trafficking       | 99.93% completion in 2019   | 99.90% completion in 2018  |
| Commitment to the Code of Conduct on an annual basis, and associated training where required                         | 99.45% commitment and recommitment in 2019  | 99.6% commitment and recommitment in 2018  |
| The number of clients and transactions reviewed by our dedicated ESRM team, including predominant sectors and themes | 1,149 clients and transactions reviewed in 2019<br><br>Predominant sectors included chemicals and manufacturing, and infrastructure and transportation. | 827 clients and transactions reviewed in 2018<br><br>Predominant sectors included chemicals and manufacturing, and infrastructure and transportation |
| The number of staff trained on Environmental and Social Risk Management  | 1,126   | 1,308  |

It also includes documenting our practical experience, such as through the case studies in this document.

We will continue to review these metrics and will introduce new metrics if we find better ways to monitor our progress in addressing modern slavery.

We welcome feedback on our modern slavery transparency statement. Please contact us at [sustainability.feedback@sc.com](mailto:sustainability.feedback@sc.com).

This statement has been approved by the Board of Directors of Standard Chartered PLC.



Our work to fight modern slavery was recognised as “Highly Commended” in the Thomson Reuters Foundation’s Stop Slavery Award 2018.



Signed by Bill Winters  
Group Chief Executive Officer  
12th February 2020



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## Full list of footprint countries

|               |                  |              |              |
|---------------|------------------|--------------|--------------|
| Angola        | Falkland Islands | Laos         | South Africa |
| Argentina     | France           | Lebanon      | South Korea  |
| Australia     | Gambia           | Macau        | Sri Lanka    |
| Bahamas       | Germany          | Malaysia     | Sweden       |
| Bahrain       | Ghana            | Mauritius    | Taiwan       |
| Bangladesh    | Guernsey         | Myanmar      | Tanzania     |
| Botswana      | Hong Kong        | Nepal        | Thailand     |
| Brazil        | India            | Nigeria      | Turkey       |
| Brunei        | Indonesia        | Oman         | UAE          |
| Cambodia      | Ireland          | Pakistan     | Uganda       |
| Cameroon      | Iraq             | Philippines  | UK           |
| China         | Japan            | Qatar        | USA          |
| Colombia      | Jersey           | Saudi Arabia | Vietnam      |
| Côte d'Ivoire | Jordan           | Sierra Leone | Zambia       |
| Egypt         | Kenya            | Singapore    | Zimbabwe     |

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