

# **MODERN SLAVERY ACT STATEMENT**

This statement is made under section 54 of the Modern Slavery Act 2015 (the Act) and constitutes Europe Arab Bank plc's (EAB) modern slavery and human trafficking statement for the financial year ending 31 December 2018.

## Organisational structure and business

EAB is a UK incorporated and regulated bank headquartered in London with branches in France, Germany and Italy. We are a wholly owned subsidiary of Arab Bank, one of the largest financial institutions in the Middle East.

EAB focuses on providing banking and financial services to our clients and business partners to support transactions between North America & Europe and the Middle East & North Africa region (MENA) in the following three core business areas:

- Corporate and Institutional Banking
- Private Banking
- Treasury.

As a financial services provider, our supply chain covers a range of products and services in relation to facilities management, professional consultancy, market data and IT and telecommunications.

EAB is committed to acting ethically and with integrity in all our business relationships and we expect our suppliers, vendors and contractors to respect human rights and promote similar principles in their own supply chain. EAB is fully supportive of the principles underlying the Act and will not knowingly support or do business with any suppliers who are involved in slavery or human trafficking.

#### Policies and controls

EAB maintains policies and controls that are most relevant to assisting in the prevention, detection, management and reporting of slavery and human trafficking in our supply chain and across our business. These include policies or controls relating to:

- reputational risk
- high risk and unacceptable customers
- third party management
- high risk countries and industry sectors
- whistleblowing
- financial crime prevention including suspicious activity reporting.

Each of the relevant policies is reviewed regularly and will be further enhanced as appropriate in light of the principles underlying the Act.

EAB operates a risk-based approach to reviewing suppliers who may carry a higher risk in this respect. EAB is enhancing its third party management framework which will include affirmation of our commitment to combatting slavery and human trafficking in our supply chain. This framework

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is subject to regular review to ensure it remains consistent with best practises in reducing the risk of modern slavery.

#### Effectiveness

When hiring employees we only make use of reputable recruitment agencies, who provide the necessary assurances and checks on candidates. We further undertake our own checks including documents checks. Our remuneration policy requires us to pay remuneration in line with market practices, including health and welfare options.

The arrangements with our facilities management service providers for London require these providers to pay the relevant staff at least the London Living Wage.

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

### **Training**

EAB recognises the importance of raising awareness in this area. In 2017 all staff undertook accredited training in relation to the issues around slavery and trafficking and the provisions of the Act. New staff are also provided with guidance on related risks and governance policies when they join the bank.

## **Board Approval**

This statement has been reviewed by EAB's senior management and was approved by EAB's Board of Directors on 17<sup>th</sup> June 2019.

Signed on behalf of the Board of Directors of Europe Arab Bank plc

Haytham Kamhiyah CEO, Europe Arab Bank plc