

FBN Bank (UK) Limited – Slavery and Human Trafficking Statement

Introduction

This statement is made on behalf of FBN Bank (UK) Limited (FBN UK) pursuant to section 54 of the Modern Slavery Act 2015 (the Act) and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2016.

This statement illustrates how we apply our corporate values in practice and represents our commitment to challenge and confront the use of forced, compulsory, trafficked or child labour within our own organisation and our supply chains.

Our structure, business and supply chains

FBN UK is a wholly owned subsidiary of First Bank of Nigeria Limited representing the entirety of the group's operations in the United Kingdom. FBN UK provides international banking and trade services to facilitate trade between Africa and Europe.

FBN UK has a number of suppliers including suppliers of IT and communications; property, office cleaning and other facilities management services; transport such as taxi services and couriers; marketing such as printed merchandise suppliers; office equipment and supplies; and professional services such as auditors, legal counsel, banks, insurers and recruitment agencies.

Our standards, policies and codes of conduct relating to slavery and human trafficking

The mission of FBN UK is to be the first choice European bank for clients conducting business with Africa. We seek to extend our leadership position by providing our customers with personalised service, easy access to our subject matter experts and senior strategic leadership. We strive to achieve our mission while continuing to build our reputation for robust compliance and governance approaches that take a long-term view of our business.

We seek to live up to our corporate values of **integrity, collaboration, accountability, respect** and **ethical behaviour**. We are focused on maintaining a culture of doing the right thing every day – for our customers, our shareholders, our employees and the communities in which we do business. We are committed to the highest standards of ethics and integrity, and compliance with laws and internationally accepted standards.

FBN UK is a business which aspires to play an important role in the fight against the existence of slavery and human trafficking within the financial institutions sector. We are keenly aware of the adverse impacts such practices have on the lives of vulnerable individuals. FBN UK's parent, First Bank of Nigeria Limited is a signatory to the Nigerian Sustainable Banking Principles where it has committed to respect human rights in its business operations and business activities. FBN UK is committed to put that commitment into practice in its UK operations.

This view spans the whole of FBN UK's organisation, from the Chief Executive downwards.

In 2016, our Chief Executive gave a speech at the 4 Pillars Forum on the challenges the African migration crisis poses to individuals who may be trafficked into third countries and exploited. The speech highlighted the steps we have already implemented, as well as those which we are intending to take in the future, to ensure that such vulnerable individuals do not have any of their human rights adversely impacted upon including by way of modern slavery or human trafficking. Our Chief Executive reiterated the need for businesses such as ourselves to go over and above the basic minimal requirements expected, to successfully address these issues.

Human Rights Policy

In 2016, FBN UK has implemented a human rights policy which reiterates our respect for internationally recognised human rights such as those set out in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, and our expectations of how we should continue to do so across the entirety of our business. Our human rights policy also sets out our intention to implement the UN Guiding Principles on Business and Human Rights in all areas of our business and to continually monitor FBN UK's impact on human rights.

FBN UK's human rights policy highlights three specific areas of our business where we intend to be particularly mindful of our impact on human rights. In our capacity:

- as a financial products and services provider we are committed to ensuring that human rights considerations are reflected in our systems, processes and lending and financing practices throughout the period of engagement with our clients; and we will work with our clients to increase their respect for and understanding of human rights as well as of potential adverse impacts which could arise as a result of their activities financed by us;
- as a purchaser of services and products we are committed to engaging suppliers who respect human rights and whose principles match our own; and to working with our suppliers to broaden their understanding of human rights and to ensure their commitment to respecting human rights; and
- as an employer: we are committed to treating our employees fairly, and without discrimination, whilst providing safe working conditions which respect their human rights and we oppose any form of forced, compulsory, trafficked or child labour in either our own business or our supply chains.

The human rights policy encourages all staff to raise any concerns, questions or grievances, and requires all staff to report any known or suspected violations of applicable laws, regulations, policies or ethics. Any concerns related to human rights internally or in our supply chain including forced compulsory, trafficked or child labour should be reported through the communication channels established under our Whistleblowing Policy.

Whistle-Blowing Policy

In support of the human rights policy, FBN UK has also made amendments to its whistle-blowing policy such that issues concerning human rights and modern slavery concerns are covered under the issues that employees should report.

Supplier Charter

FBN UK has also introduced a Supplier Charter in 2016. The Supplier Charter sets out the expectations we have of our suppliers and provides a principle based approach as to the way we expect them to conduct business within both their own operations and within their supply chains.

Specifically, the Supplier Charter requires that all suppliers who engage with FBN UK should:

- not hold another person in any form of slavery, or employ, engage or otherwise use forced, compulsory or child labour, as well as refraining from using any abusive or inhumane treatment of any of their employees;
- not act, or fail to act, in such a way that they would directly or indirectly adversely impact the human rights of any individual or third party;
- comply with all applicable employment and diversity laws, including with regard to recruitment, retention and promotion of employees;
- comply with all health and safety laws and provide a safe working environment for all employees; and
- report any breach of the Supplier Charter to FBN UK and to take reasonable steps to redress, remedy and prevent any further breaches of the Supplier Charter.

Third Party Vendor Selection Policy

As part of our third party vendor policy review we have included human rights criteria in our vendor screening, contracting and monitoring processes.

Due diligence and steps taken related to slavery and human trafficking

Suppliers

In 2016 FBN UK began a due diligence process on our supply chains.

Our impact assessment was initiated in 2016 and has been carried out to the following extent:

- identifying all of FBN UK's tier 1 suppliers;
- Allocating each tier 1 supply contract with a risk category representing an appropriate degree of modern slavery risk based on key factors such as geographical location and the industry type relevant to the product or service being provided. The risk categories matrix was informed by independent studies and reports into the prevalence of modern slavery in monitored countries and sectors.

By the end of 2016, and continuing into the 2017 financial year, FBN UK has been in the process of identifying the high risk relationships with our tier 1 suppliers. The intention of this step is to be able to better understand our relationship with high risk suppliers and to establish what measures they have in place to combat modern slavery and where necessary, contact suppliers with requests for further information which will enable us to perform enhanced due diligence.

Our suppliers are selected on the basis of and our relationships with them are governed by our updated Third Party Vendor Policy. We have in place contractual protections for future supply contracts and outsourcing agreements, setting out the obligations of service providers not to commit human rights violations, and requiring them to comply with our Supplier Charter. Our contractual protections ensure that suppliers engaging with FBN UK shall be contractually bound to adhere to minimum human rights standards, and to inform us if any breaches of these standards have taken place.

Measuring effectiveness

The implementation of our Human Rights Policy and Supplier Charter, combined with the amendments we have made to our Whistle-blowing policy, supply contracts and third party vendor selection policy are the 2016 steps taken on our journey to strengthen, develop and establish underlying principles, systems and processes to systematically address modern slavery in our organisation and our supply chains. This is an on-going process, and we intend to put specific performance indicators in place in the coming years starting with the financial year 2017.

Training

FBN UK recognises that the knowledge, responsibility and conduct of our staff play an important role in mitigating the risk of slavery and human trafficking within our organisation. We have therefore set out an action plan to progress the training of our management and employees starting in 2017.

Approval

The Board of Directors of FBN UK has approved this statement on 12 June 2017.

Sam Aiyere, Chief Finance Officer, 20 June 2017