

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 2019.

FBN UK has a zero-tolerance approach to Modern Slavery within its operations and within the supply chain. We always conduct our business with integrity and within the laws and regulations of the countries we operate in. We recognise the need to be aware of the risks in our business and supply chain and have taken appropriate steps to mitigate these risks. 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

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.

Our Business and Supply chains

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

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 our supply chain or in any part of our business. 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.

Human Rights Policy

FBN UK maintains 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.

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

FBN UK maintains a Whistleblowing Policy, which encourages staff to raise any concerns in relation to human rights and /or modern slavery issues through internal or external whistleblowing channels.

Procurement and Vendor Management Policy

Under the FBN UK Procurement and Vendor Management Policy, we have included human rights criteria in our vendor screening, contracting and monitoring processes. 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

The FBN UK Procurement and Vendor Management Policy and Procedures include the processes for complying with the relevant requirements under the Modern Slavery Act at on-boarding and subsequently throughout the bank's relationship with the vendor.

Our suppliers are selected based on, and our relationships with them are governed by, our updated 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. 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.

Risk Assessment

FBN UK as part of its ongoing relationships with suppliers, vendors and/or outsourcers periodically reviews the relationship with these third parties assessing the risk that FBN UK might be inadvertently exposed to the use of modern slavery within the supply chain.

Measuring effectiveness

FBN UK periodically reviews on boarding process for vendors and/or outsourcers to ensure the measures implemented are effective. Staff responsible for this process have been provided the required training.

The implementation of our Human Rights Policy, combined with the Whistle-blowing policy, supply contracts and third party vendor selection policy are the 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.

Training

FBN UK recognises that the knowledge, responsibility and conduct of our staff plays an important role in mitigating the risk of slavery and human trafficking within our organisation.

FBN UK includes an Anti-Slavery module as part of the online training programme provided to staff.

Approval

The Board of Directors of FBN UK has approved this statement on 13th November 2020.



Sam Aiyere
CEO, Director of FBN Bank (UK) Limited