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## Human Rights, Modern Slavery and Human Trafficking Statement

### Introduction

This statement is made on behalf of FirstBank UK Limited (the 'Bank' or 'we') 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 2025.

The Bank has a zero-tolerance approach to Modern Slavery<sup>1</sup> within its operations and supply chain, as set out below. We always conduct our business with integrity and within the laws and regulations of the countries in which we operate. We recognise the need to be aware of the risks associated with Modern Slavery in our business and supply chain and have taken appropriate steps to mitigate these risks, as set out below.

This statement illustrates how we apply our corporate values in practice and represents our commitment to challenge and to confront any use of Modern Slavery within our organisation and supply chain.

### Our Structure

The Bank is a majority-owned subsidiary of First Bank of Nigeria Limited, representing the entirety of the FirstBank Group's operations in the United Kingdom. The Bank provides international banking and financial services to facilitate trade between Africa and Europe.

The Bank currently operates in London, with representative offices in Paris and Lagos.

### Our Business and Supply Chain

The Bank is authorised by the UK Prudential Regulation Authority and regulated by the UK Financial Conduct Authority and Prudential Regulation Authority. The Bank provides a range of domestic and international banking and financial services. These services include Corporate Banking, Institutional Banking, Private Banking, and Capital Markets.

The Bank has a number of suppliers. These include suppliers of IT and communications services property, office cleaning and other facilities management services, transport such as taxi services and couriers, marketing such as printed merchandise suppliers, office equipment, and professional services such as auditors, banks, insurers, law firms, and recruitment agencies. All

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<sup>1</sup> The term "Modern Slavery" here means the practices giving rise to the offences in Sections 1 and 2 of the Act. Section 1 refers to slavery, servitude and forced or compulsory labour. Section 2 refers to human trafficking.



suppliers undergo risk assessments at the onboarding stage and thereafter on a periodic basis.

### **Our Standards, Policies and Codes of Conduct**

We seek to live up to our corporate values of

- (a) Working together - We know that by working together we will achieve more than we can alone;
- (b) Being inclusive – We create a safe environment where people can be themselves and feel valued;
- (c) Taking ownership – We have high standards and hold ourselves to account;
- (d) Thinking big and making it happen – We are ambitious and innovative; we want to get things done;
- (e) Showing we care – We find the right balance for our customers, ourselves and our stakeholders.

We are focused on maintaining a culture of doing the right thing every day – for our customers, shareholders, employees, and the communities in which we do business. We are committed to the highest standards of ethics and integrity, and compliance with applicable laws, regulation, and internationally accepted standards.

The Bank is a business which aspires to play its role in the fight against the existence of Modern Slavery in our supply chain or any part of our business. We are keenly aware of the adverse impacts such practices have on the lives of vulnerable people. The Bank's parent, First Bank of Nigeria Limited, is a signatory to the Nigerian Sustainable Banking Principles under which it has committed to respect human rights in its business operations and business activities.

### Human Rights and Modern Slavery

The Bank is committed to upholding 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.

In our capacity:

- as a financial products and services provider, we are committed to ensuring that human rights considerations are reflected in our lending and financing practices, throughout the period of engagement with our clients;
- as a purchaser of services and products, we aim to engage with suppliers who respect human rights and whose principles match our own; and collaborate with our suppliers in respect of 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 Modern Slavery in either our own business or our supply chain.



The Bank 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 (including Modern Slavery) internally or in our supply chain should be reported through the communication channels established under our Whistleblowing Policy.

### Whistleblowing Policy

The Bank maintains a Whistleblowing Policy, which encourages staff to raise any concerns through internal or external whistleblowing channels and represents a suitable method through which concerns in relation to human rights and/or Modern Slavery may be communicated.

### Outsourcing and Third-Party Risk Management Policy

Under our Outsourcing and Third-Party Risk Management Policy and supporting Procedures, we incorporate anti-modern slavery measures as part of our vendor selection process and apply risk-based due diligence as well as ongoing monitoring processes across our third-party relationships.

### **Due Diligence and Risk Assessment**

The Outsourcing and Third-Party Risk Management Policy and Procedures include processes for vendor onboarding, due diligence and ongoing monitoring throughout the Bank's relationship with the vendor. Our suppliers are selected based on, and our relationships with them are governed by, this Policy and the Procedures.

The Bank, as part of its ongoing relationships with suppliers, vendors and/or outsourcers, periodically reviews its relationship with these third parties, applying a risk-based approach to assess potential risks that the Bank might be inadvertently exposed to the use of Modern Slavery within the supply chain.

For our material outsourcing arrangements we have more stringent processes in place, including enhanced due diligence and more frequent ongoing review and oversight, and we ensure that the anti-modern slavery approaches of these suppliers are aligned with ours.

In addition:

- The Bank has robust controls designed to detect, deter, and prevent money laundering and all forms of financial crime;
- The Bank's onboarding team conducts due diligence on all account applications and periodically throughout the life of the relationship.



Further, certain countries are regarded by the Bank as presenting a higher risk by virtue of their associations with corruption or other criminality (**'High-Risk Countries'**). The Bank classifies countries as High-Risk in line with the relevant Money Laundering and Terrorist Financing Regulations. Where a customer presents from a High-Risk Country (for example, by living or being incorporated in that jurisdiction), the Bank applies enhanced measures to ascertain whether the Bank is comfortable doing business with this individual/entity.

### **Recruitment**

We ensure compliance with applicable laws during recruitment and onboarding of staff.

The Bank ensures that all employees have the right to work in their respective jurisdictions. All employees that are recruited by the Bank go through an interview process and background screening, which includes obtaining employment references.

The Bank uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. All agencies the Bank uses undergo enhanced vendor due diligence. Temporary staff are subject to the same integrity background checks as the Bank's employees.

### **Training**

As part of its training programme, the Bank organises mandatory Modern Slavery training for staff on an annual basis. In addition, staff are trained on workplace culture and behaviours and are encouraged to "speak up" if they have any concerns or grievances.

### **Measuring effectiveness**

The Bank periodically reviews onboarding processes for vendors and/or outsourcers to ensure the measures implemented are effective. Staff responsible for this process have been provided with the required training.

The Bank's commitment to upholding internationally recognised human rights, combined with our Whistleblowing Policy and Outsourcing and Third-Party Risk Management Policy, are the steps taken on our journey to strengthen, develop and establish underlying principles, systems, and processes to address systematically the risks of Modern Slavery in our organisation and our supply chain.

### **Continuous Improvement**

Over the next financial year, the Bank will ensure that it continues to make progress in identifying, preventing and responding to Modern Slavery risks by:

- continuing to raise awareness of modern slavery risks across all levels of the Bank; and



- continuing to assess and further develop the Bank's supplier procurement and due diligence processes.

### **Approval**

The Board of Directors of FirstBank UK Limited approved this statement on 22 May 2026

Signed by:  
  
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Andrew Alli

Chair

Signed on 6/1/2026 | 10:39:11 BST