

## Modern Slavery Statement 2019

### Introduction

Access Private Bank ('the Bank') operates a zero tolerance approach to all human rights infringements within our own operations and our supply chains. As a part of this, the Bank provides this statement, in accordance with the Modern Slavery Act 2015 ('The Act'), to outline the steps that we take to ensure modern slavery and human rights violations do not take place in any part of our business or the businesses of suppliers that we deal with.

### Organisational structure and supply chains

Access Private Bank is a division of The Access Bank UK Limited which is a wholly-owned subsidiary of Access Bank Plc, a Nigerian Stock Exchange listed company.

We provide Trade Finance, Commercial Banking and Asset Management services for clients of Access Bank Group in their dealings with OECD markets, and support companies exporting to African markets.

We are authorised by the Prudential Regulation Authority (PRA) and regulated by the Financial Conduct Authority (FCA) and the Prudential Regulation Authority. The Bank has a Dubai branch office which is regulated by the Dubai Financial Services Authority (DFSA).

Further details of our operations are set out in our annual reports, a copy of which can be accessed on this website in the Financial Reports section.

### Policies

Internally the Bank's policies include an Employee Handbook, HR Policies Manual, Compliance Manual, and AML Manual. These policies set out the requirements and expectations for all staff members to follow in respect of their conduct and full compliance with UK law and regulation.

The Bank's core values respect the differences and diversity of our people and empower them to achieve the highest standards of professionalism and integrity, and this is reflected in our policies. We are proud to have achieved the Investors in People Platinum accreditation, which is recognised across the world as a mark of excellence. The Bank seeks to create a working environment that engenders freedom, equality, respect and co-operation.

All staff are required to operate in line with the UK Individual Accountability regime, which requires individuals working at all levels to meet appropriate standards of conduct, and ensures that senior managers are held to account for misconduct that falls within their area of responsibility.

Our equal opportunities policy is based on codes of practice produced by the Equality and Human Rights Commission and the Department for Work and Pensions. The Bank also has an established whistleblowing procedure, which encourages all staff to speak out if they should have concerns about impropriety within the Bank.

## **Due Diligence**

As part of our ongoing pledge to prevent exposure to all forms of modern slavery, the Bank conducts a rigorous process of due diligence on all partners and suppliers who wish to work with us, and this is detailed in our procurement policy.

The Bank completes a comprehensive risk assessment in respect of partners and suppliers. Any new relationships are only approved following satisfactory due diligence checks, and the Bank completes ongoing due diligence checks of existing suppliers, to include sight of a supplier's modern slavery statement where applicable.

Such due diligence checks serve as controls to protect the Bank from dealings with parties subject to criminal offences, including human rights violations such as those highlighted by the Modern Slavery Act.

## **Assessing and managing risk**

As a regulated financial institution, the Bank is at lower risk of exposure to the types of human rights violations highlighted by the Modern Slavery Act, however the company acknowledges that it is important to remain vigilant.

Slavery and human trafficking are crimes, and as such the criminals responsible will attempt to hide proceeds in the financial system and legitimise them, also known as money laundering. The Bank has robust controls designed to detect, deter and prevent money laundering and all forms of financial crime.

## **Training our people**

As an employer we aim to provide the highest standards of training to enable our people to be risk aware and operate to the high standards expected of them.

The Bank has an annual training programme which reinforces key messages in respect of the Bank's core values, the risks that the Bank is exposed to and its risk management framework. This supplements the Bank's policies and procedures, which are refreshed in response to regulatory developments and as a minimum annually. The combination of these activities raises awareness and drives high levels of personal accountability and ethical behaviours in our people, and full compliance with our legal and regulatory obligations.

The opportunity has been taken to brief staff on modern slavery risks and to update our Anti-Money Laundering Policy Manual in respect of the provisions of the Modern Slavery Act.

## **Assessment of effectiveness**

The Bank is committed to evolve and consistently improve in this area, particularly through staff training. This will ensure that the Bank continues to effectively mitigate the risks of modern slavery occurring within its operations.

**This statement is approved by the Board of Directors of Access Private Bank.**