

Modern Slavery Statement 2022

Introduction

This statement sets out Access Private Bank (the Bank) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

At Access Private Bank, we believe we have responsibility to ensure that our business is conducted in an ethical way and we actively address social issues.

Access Private Bank recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

We are committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

The Bank provides 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)

Countries of operation and supply

The Bank currently operates in the following countries:

- United Kingdom
- Dubai
- Nigeria

Certain countries are regarded by the Bank as presenting a higher risk by virtue of their associations with organised crime, drug trafficking, official corruption and terrorism ('High Risk Countries'). The Bank classifies countries as High-Risk inline Schedule 3ZA of the ML Regulations (as amended by The Money Laundering and Terrorist Financing (Amendment) (High-Risk Countries) Regulations 2022) which identifies high-risk third countries with strategic deficiencies in the area of anti-money laundering or counter terrorist financing. The list mirrors FATF's jurisdictions under increased monitoring and high-risk jurisdictions subject to a call for action. In this respect, the Bank currently identifies the following countries as high risk:

Albania, Barbados, Burkina Faso, Cambodia, Cayman Islands, Democratic People's Republic of Korea, Democratic Republic of Congo, Haiti, Gibraltar, Iran, Jamaica, Jordan, Mali,

Morocco, Mozambique, Myanmar, Panama, Philippines, Senegal, South Sudan, Syria, Tanzania, Turkey, Uganda, United Arab Emirates and Yemen.

Whilst this list includes certain high risk countries that the Bank does not and would not deal with, any applications that are received where the applicant is either an individual living in one of these countries, or a business or correspondent bank incorporated or having its principal place of business in one of these countries must be referred to the AML team for the purposes of obtaining senior management (MLRO and CEO) approval to open the account.

- The Bank's Head Office is located in the heart of the City of London and overlooks the Bank of England and our Operations Division is located near Manchester. We also have a branch operation within Dubai's International Finance Centre and offices in Lagos, Nigeria, on the Osborne Estate in the Ikoyi area.

We provide the following services:

- Personal Banking
- Business Banking
- Wealth Management (Private banking)
- Property loans
- Trade Finance

Risk Assessment/Investigations/due diligence:

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, and 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.

- The Bank's onboarding team conducts a rigorous process of due diligence on all account applications.
- The Bank's Compliance and AML teams conduct a rigorous process of due diligence on new partners and suppliers who wish to work with us, and this is detailed in our procurement policy.
- The Bank repeats this due diligence for all suppliers on an annual basis, in order to ensure continual monitoring.

Relevant policies

The Bank prides itself in providing our staff with a safe working environment where they are valued, adequately rewarded and respected. Our commitment to ensuring the wellbeing of our staff, including having a diverse and inclusive workforce is paramount to our culture.

Our internal policies and procedures are in place in order to ensure this safe and inclusive working environment for our staff, and describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations. These include:

- Employee Handbook - This makes clear to our employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour. It also includes whistleblowing, harassment and bullying, diversity and inclusion, health and safety, valuing equality and diversity.
- Equality, Diversity and Inclusion Policy.
- HR Policies Directory – contains all of the Bank’s HR policies, including Recruitment Policy, reward and recognition, equal opportunities, conduct, disciplinary, professional behaviour.
- Modern Slavery Policy
- Procurement Policies Manual
- Conflicts of Interest Policy
- Bribery Act Policy

Supplier/Procurement

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 as part of its regular due diligence process in respect of existing suppliers, and during the onboarding process for potential suppliers.

As part of the annual reviews, we ask our suppliers to provide us with a copy of their Modern Slavery statement.

Recruitment

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.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include, as part of our ongoing pledge to prevent exposure to all forms of modern slavery, 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.

Performance indicators

The Bank has reviewed its key performance indicators (KPIs). As a result, the organisation requires all staff to have completed training on modern slavery on an annual basis.

Training

The Bank requires all staff within the organisation to review the Bank's Modern Slavery Policy on an annual basis.

This policy explains the basic principles of the Modern Slavery Act 2015, the processes that the Bank has in place to prevent modern slavery in our business and supply chains, and what action should be taken by staff if slavery or human trafficking is suspected, including how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.

When potential victims are identified

In the event of victims of Modern Slavery being identified in the provision of an Access Private Bank contract, Access Private Bank will:

- notify the appropriate law enforcement agencies
- work openly and proactively with suppliers to resolve issues and change working practices
- consider terminating the contract only as a last resort.

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