

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. **Our Bank:** BACB is an international wholesale bank. We provide tailored trade solutions to clients, with a focus on facilitating trade to and from developing markets in Africa and the Middle East. Established in 1972, BACB is a UK-registered public limited company. We are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.
2. **Our Staff:** Our ambition is to foster continually a culture of transparency and honesty, an inclusive and ethical environment where everyone plays their part in ensuring that the needs of our customers remain paramount. Conduct is what we do and culture is how we do it; to achieve this we will drive change by living the BACB values, which underpin our core competency framework. In 2018 we introduced a new People Strategy to better link our business strategy with our workforce and an even more transparent framework to develop and review culture and conduct at the Bank. We pay all our staff and third party service providers at least the Living Wage, and in addition pay towards other benefits including health and welfare options.

New employees are subject to a full and rigorous screening process, which would highlight any breaches of the Modern Slavery Act 2015. We involve only reputable recruitment agencies as part of our hiring process that, in conjunction with our Human Resources department, carry out all required checks and assurances on potential employees.

Alongside all mandatory training, the Bank hosts its policies and training manuals relevant to modern slavery and human trafficking as recommended by UK Government on its intranet site, which is accessible by all employees.

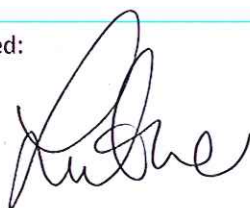
3. **Our Suppliers and Customers:**
 - **Suppliers:** The Bank has put into place a Procurement Policy, which clearly states that contracts with suppliers must comply with the Modern Slavery Act 2015. Each supplier is vetted and scanned using external search and database tools before we embark on business together, and on an on-going basis.
 - **Customer KYC:** BACB employs a dedicated KYC on-boarding team who review all customers at the point of on-boarding and at regular periods thereafter. Their procedures explicitly include a requirement to screen all customers and related parties for any rumours or allegations pertaining to Slavery and Human Trafficking.
4. **Our Approach to Compliance and Risk:** It goes without saying that we meticulously follow the rules and codes of the Prudential Regulation Authority and the Financial Conduct Authority.

We are committed to eradicating any source of financial crime or any other kind of misconduct and have a zero-tolerance attitude towards breaching sanctions, money laundering, bribery, corruption and terrorist financing and have a robust governance structure, supported by policies that are accessible to all employees.

We are all accountable for our actions and responsible for making sure that we carry out our business with integrity and contribute to enhancing the culture and reputation of BACB through the way we work, which is outlined in the Bank's Culture and Conduct Risk Governance Standard and Policy.

We will continue to give due regard to the requirements under the Modern Slavery Act 2015 and to enhance our policies and processes as necessary.

Signed:



Susannah L. Alier
Chief Executive Officer