



Anti-Slavery and Human Trafficking Policy Statement as on 3rd August 2018

Introduction

This Anti-Slavery and Human Trafficking Statement is made pursuant to Section 54 (1) of the Modern Slavery Act, 2015.

Type of Business and Business structure:

FCMB Bank (UK) Limited is an independently incorporated, wholly-owned subsidiary of First City Monument Bank Ltd (FCMB), a member of the FCMB Group PLC, a leading financial services group based in Nigeria and regulated by the Prudential Regulation Authority (PRA) and the Financial Conduct Authority (FCA). The Bank operates in London, United Kingdom with major business activities as corporate deposit taking, trade finance, treasury operations and stockbroking.

Modern slavery and Human trafficking policy:

This statement aims to affirm the position of the organisation against any form or manner of slavery, servitude, forced labour, human trafficking, sexual exploitation, child labour, physically abusive disciplinary practises or any similar manner of victimisation of employees of the Bank or in the supply chain of the Bank. The Bank shall, under no circumstances tolerate forced labour and breach of fundamental human rights.

Due Diligence and compliance:

The main resources of the Bank are its employees working at all levels including but not limited to the directors, officers, external consultants, external contractors, business partners and those employed on a full time, part time, temporary, contractual basis.

The Bank is committed to safeguarding the principles set out in the Modern Slavery Act, 2015 against modern slavery and human trafficking. In a bid to prevent people being treated as commodities and maintaining human dignity, the Bank is committed to maintain the transparency in its business practices and working conditions.

The Bank shall ensure that its hiring and remunerative practices are continually compliant with the relevant legislative requirements.

The Bank has zero tolerance towards slavery and human trafficking and shall communicate its modern slavery and human trafficking policy to all suppliers, contractors and business partners.

The Bank shall not support, deal with or partner with any such business knowingly involved in slavery or human trafficking. The Bank shall terminate its relationship with any employee or business found in breach of this policy statement.

The senior management of the Bank shall appoint or designate an employee as a "Nominated Officer" for the implementation and enforcement of this policy statement.

The Bank shall provide sufficient resources, internal training and make investments to ascertain that slavery or human trafficking is not taking place within the organisation itself or any of its supply chains.

The Bank shall encourage its employees to put forth their queries or concerns in this regard to the Nominated Officer who shall promptly address the same. The Nominated Officer and the senior management shall also be responsible for the fulfilment of the legal and ethical requirements in relation to this policy statement.

This policy statement has been approved by the senior management of the Bank and shall be reviewed and updated annually.