

Modern Slavery Act Policy

August 2018



Modern Slavery Act Policy	
Approval Sheet	
Policy Owner:	Head of Compliance
Implementation Responsibility:	Head of Compliance
Custodian:	Compliance Department
Operating Jurisdiction:	Habibsons Bank UK and Europe
Review Frequency:	Every two years or earlier if required
Review Responsibility:	Head of Compliance
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Proposed by: Eamonn O’Gorman – Head of Compliance	
Concurred by: Mr Arif Ali – Chief Executive Officer	
Recommended by: ACC in its Meeting held on 28.8.2018	
Board of Directors: Approved in its meeting held on 29.8.2018 Agenda item: 13 b	

Action Required	
Copy of Board approved policy obtained from Company Secretary	
Policy versions uploaded to Policy Hub	
Policy circulated and or uploaded into individuals’ libraries	
Policy Review date established / updated in Policy Hub	

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VERSION CONTROL

Version #	Prepared by	Date	Reason
1.0	Eamonn O'Gorman	2 nd July 2018	Initial Document

1. BACKGROUND

Modern Slavery is the illegal exploitation of people for personal or commercial gain. Victims are trapped in involuntary servitude, a product of deception and coercion. Common forms of exploitation include human trafficking, domestic servitude, sexual exploitation, forced marriage, forced criminality, and forced labour.

Legislative background

Section 54 of the Modern Slavery Act 2015 ("MSA 2015") requires the publication of an annual Modern Slavery Policy, including the steps taken to address modern slavery within the business and supply chain. Where no such steps have been taken, then this too must be disclosed.

MSA 2015 Compliance

In compliance with s54 of MSA 2015, Habibsons Bank Limited, trading as Habib Bank UK ("HBL UK", "the Bank" or "We") has formulated this Modern Slavery Policy. This document is designed to elaborate upon, substantiate and set-up processes to meet the requirements of the MSA 2015.

Scope of the Modern Slavery Policy

This policy applies to all HBL UK's staff and persons working on its behalf in any capacity including:

- Individuals working for HBL UK, or on our behalf, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns and agents ("HBL UK Staff"); and
- our contractors, external consultants, agencies, third-party representatives, and business partners ("Suppliers").

Implementing Modern Slavery Policy at HBL UK

Under the Modern Slavery Policy, HBL UK has requested that vendors take tangible steps towards ensuring their operations and supply chains are trafficking and slavery free, including the imposition of contractual clauses and the requirement of a Modern Slavery Policy.

2. MODERN SLAVERY POLICY

HBL UK is authorised by the Prudential Regulation Authority ("PRA") and regulated by the Financial Conduct Authority ("FCA") and PRA.

HBL UK is committed to the highest level of ethical standards and sound governance. We have a zero-tolerance approach towards Modern Slavery and are committed to acting ethically and with integrity in all our business relationships.

We encourage all organisations we engage with to influence their global supply chains by improving transparency and accountability. We encourage our contractors, suppliers, and associated parties to acknowledge the mandatory requirement to comply with the Modern Slavery Act 2015.

3. RESPONSIBILITY FOR THE POLICY AND ITS APPLICATION

HBL UK's Board of Directors has ultimate and overall responsibility for ensuring that the Bank complies with the legal and ethical obligations arising under the Modern Slavery Act 2015. Accordingly, HBL UK's Board will adopt this Modern Slavery Policy and sign-off on the Modern Slavery Policy following any amendments arising from periodic review.

The Head of Compliance has responsibility in ensuring the Modern Slavery Policy is kept up to date based on any business changes and/or changes in the legislation. However, Management at all levels are responsible for ensuring that those reporting to them understand and comply with this Modern Slavery Policy.

As part of the annual update of the Modern Slavery Policy, the policy shall be reviewed every two years. HBL UK will provide information on any changes made as a result.

HBL UK's existing risk management structure provides the framework to support compliance with the requirements of the Act, primarily through oversight by the policy owner, including reviewing the processes in place for implementing this Modern Slavery Policy; monitoring its use and effectiveness; ensuring that managers and employees receive adequate training as required.

HBL UK maintains a Vendor List as part of the Vendor Management Programme, and monitors whether each vendor has a policy and/or statement in place to tackle modern slavery. The Vendor List is kept up to date by Operations Department which is responsible for ensuring this Modern Slavery Policy is applied to all vendor relationships.

4. COMPLIANCE WITH THE POLICY

All HBL UK staff must ensure that they read, understand and comply with this Modern Slavery Policy.

All HBL UK staff and suppliers are required to ensure that they avoid any activity that might lead to, or suggest, a breach of this Modern Slavery Policy. Any doubts as to whether an activity contravenes this Modern Slavery Policy, should be reported, or discussed with the Bank's Management Committee.

HBL UK will only employ individuals who are legally permitted to work in the UK, as evidenced by valid documentation.

HBL UK will always adhere to the minimum wage regulations occurrent in the UK under the relevant national minimum wage acts.

Further information is also defined in the Vendor Management and Human Resource policies.

We encourage openness and transparency and will support anyone who raises genuine concerns in good faith under this policy. Per our Whistleblowing policy, those who raise concerns, even if these concerns result in no action, will not suffer any detrimental treatment.

All notifications under this Modern Slavery Policy will remain confidential. Detrimental treatment in this case means disciplinary action, dismissal, threats or any other unfavorable treatment that results from raising a concern. Any detrimental treatment on account of raising a concern under this Modern Slavery Policy, should be reported to the line manager and/or Head of HR.

5. COMMUNICATION AND AWARENESS OF THIS POLICY

HBL UK will provide staff training through an online module, which will be refreshed annually in accordance with HBL UK's training procedures. In addition, distribution of this policy across the Bank will be ensured.

Compliance Department will periodically raise awareness of modern slavery issues by sending out emails to staff articulating the following:

- the basic principles of the Modern Slavery Act 2015;
- how employees can identify slavery or human trafficking;
- what employees can do to raise issues in relation to potential slavery or human trafficking to the relevant parties; and
- what external help is available

The Bank's staff training will be designed to identify the signs of modern slavery and to flag up potential issues.

6. BREACHES OF THE POLICY

Any employee who breaches this policy may face disciplinary action which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and associated parties working on our behalf if they are found to have breached this policy.

7. KEY CONTACTS

If you have any questions about this Policy, please contact the appropriate person listed below:

Mr Eamonn O’Gorman – Head of Compliance – Eamonn.O’Gorman@hbluk.com

Mr Ali Ansari – Compliance Manager – Ali.Ansari@hbluk.com