

British Arab Commercial Bank plc
(the “Company”, “Bank” or “BACB”)

Modern Slavery and Human Trafficking Statement

For the Year Ended 31 December 2025

1 Introduction

This statement sets out the steps taken by British Arab Commercial Bank plc (“BACB”, the “Bank”) to prevent modern slavery and human trafficking¹ in its business and supply chain during the year ended 31 December 2025, in accordance with the Modern Slavery Act 2015.

BACB is committed to operating to the highest legal, regulatory, and governance standards. The Bank conducts its business in an ethical, transparent, safe, and sustainable manner and seeks to prevent and mitigate the risk of modern slavery rights abuses in all areas of its operations.

2 Our Business

BACB is a UK-domiciled international specialist bank, employing 260 people (during the period), predominantly in the UK. The Bank is authorised by the Prudential Regulation Authority (“PRA”) and is dual-regulated by the PRA and the Financial Conduct Authority (“FCA”).

BACB provides specialist banking services to its clients through an international correspondent banking network and maintains close relationships with those with whom it does business.

The Bank primarily relies on UK-based third-party suppliers for services including building maintenance. However, the Bank does contract with key information technology suppliers based in Europe and the USA.

3 Our Supply Chain

BACB operates a Third-Party Management Policy that sets out the framework for the procurement and oversight of goods and services provided by third parties.

As part of its annual enhanced due diligence processes, the Bank recognises potential exposure to modern slavery risks through:

- Third-party providers of IT, facilities management, and security services
- Temporary staffing agencies and contractors
- Corporate clients and counterparties operating in regions with a higher prevalence of modern slavery

Where appropriate, material service providers are required to contractually commit to compliance with applicable laws, including the Modern Slavery Act 2015, and may be subject to ongoing monitoring and review.

4 Due Diligence

Suppliers

The Bank conducts due diligence on all suppliers before entering into a business relationship and on an ongoing basis thereafter, in line with its Third-Party Management Policy. Suppliers are vetted using external search and database tools to identify potential risks, including those linked to modern slavery.

Customers

BACB operates a dedicated Know Your Customer (“KYC”) onboarding function. All customers and relevant related parties are screened prior to onboarding and reviewed periodically thereafter for adverse media and financial crime risks, which may include indicators of modern slavery.

5 Our Colleagues

BACB seeks to promote a culture of integrity, transparency, and accountability. Conduct and culture underpin the Bank’s strategy, and colleagues are expected to uphold high standards of professionalism and ethical behaviour.

¹ All further references made herein to modern slavery includes human trafficking.

All UK-based colleagues are paid at least the Real Living Wage and receive a cash benefits allowance to support flexible benefits. Colleagues are subject to continuous monitoring and must complete an annual attestation confirming compliance with applicable policies and standards.

BACB is committed to equality, diversity, and fairness and complies with the Equality Act 2010. The Bank promotes equal treatment without discrimination and protects colleagues from harassment, victimisation, and unfair treatment.

6 Policies

Relevant policies are available to all colleagues through internal communication channels, including the intranet. These policies cover areas such as procurement, whistleblowing, individual accountability, risk and conduct management, and statutory and regulatory obligations.

Whistleblowing

BACB maintains a Whistleblowing Policy designed to encourage colleagues to raise concerns about potential wrongdoing. The framework is overseen at Board level by an Independent Director and supported by a senior internal manager, ensuring effective and independent oversight.

7 Compliance, Risk Management, and Governance

BACB recognises that certain jurisdictions and activities may present higher inherent risks but has no appetite to facilitate financial crime or misconduct, including modern slavery.

The Bank operates a proportionate governance and risk framework, supported by monitoring tools, policies, and processes designed to identify, assess, and mitigate current and emerging risks.

Country risk profiles and other relevant risk indicators are regularly reviewed.

Although BACB considers the inherent risk of modern slavery within its business to be low, it takes its responsibilities seriously and remains vigilant to changes in risk exposure across its operations and supply chain.

All colleagues operate within the UK Individual Accountability framework, which promotes high standards of conduct and assigns clear responsibility for misconduct.

8 Training

The Bank maintains an annual training programme to ensure colleagues understand the risks of modern slavery and their responsibilities in identifying and escalating potential concerns. Mandatory training and guidance are provided in line with UK Government recommendations and support the Bank's values, policies, and risk management framework. Training is reviewed and updated regularly in response to regulatory developments and helps colleagues recognise red flags that may indicate forced labour or exploitation.

9 Assessment of effectiveness

BACB remains committed to continuous improvement in addressing modern slavery risks. The Bank will continue to review and enhance its policies, systems, and processes to ensure they remain effective and proportionate.

10 Approval

This statement was approved by the Board of British Arab Commercial Bank plc on **22 May 2026** and is signed on its behalf by:



Paul Jennings
Chief Executive Officer
22 May 2026