

## Modern Slavery Statement 2019

This statement has been published in accordance with the UK Modern Slavery Act 2015. It sets out the steps taken by AIB Group plc during year ending 31 December 2018 to prevent modern slavery and human trafficking (“**Modern Slavery**”) in its business and supply chains. This statement is made by AIB Group plc on behalf of AIB Group plc, Allied Irish Banks, p.l.c. and all subsidiaries of Allied Irish Banks, p.l.c. (collectively referred to as the “AIB Group”).

### Introduction

AIB Group has a zero tolerance approach to Modern Slavery within its own operations and within the supply chain. We recognise the need to be aware of the risks in our business and our supply chain and have taken appropriate steps to mitigate these risks. Our Code of Conduct underpins all our actions and staff are encouraged to report any concerns which Senior Management are expected to act upon.

### Our Business and Supply Chains

AIB Group operates mainly in Ireland but, through its subsidiaries, also has branches and undertakes activities in the UK. Members of the wider AIB Group operate in Northern Ireland as First Trust Bank and in Great Britain as AIB (GB). A list of the AIB Group companies, which do business in the UK, is set out in Schedule 1. As a Financial Services Business, the inherent risk of Modern Slavery in our internal operations is considered relatively low. Our supply chains are primarily confined to the Ireland and the UK, with a small number of our Third Parties operating globally.

### Policies

AIB Group internal policies, which are reviewed on an annual basis, include a **Code of Conduct** which sets out the key standards for behaviour and conduct that apply to all employees. The Code includes particular requirements regarding responsibilities of management for ensuring that business and support activities are carried out to the highest standards of behaviour. The application of the Code is underpinned by policies, practices and training which seek to ensure that it is understood and that all employees act in accordance with it.

We also operate a **Speak Up** policy which encourages staff to raise any concerns of wrongdoing through a number of channels, both internal and external, including a confidential external help-line. Employees are assured that if they raise a concern in good faith AIB Group will not tolerate victimisation or unfair treatment of the employee as a result.

Our **Diversity and Inclusion** policy helps us to be the best that we can in our thinking, our decisions, and our outcomes. By respecting, developing, and harnessing the talents of all our employees, we commit to creating an inclusive and supportive organisation that treats everyone with dignity and respect. We aim to respond quickly and responsibly to any

complaints of discrimination, victimisation, intimidation, harassment, bullying or misconduct.

Our **Third Party Management** policy sets out the actions required for the implementation and subsequent monitoring of any new Third Party arrangement including the renewal or the alteration to any existing Third Party arrangement. The policy includes the requirement for a comprehensive due diligence process prior to the execution of the contract.

### **Due Diligence of Third Parties and Supply Chain**

The largest potential exposure for Modern Slavery risk for AIB Group lies within our supply chains. As stated above, our **Third Party Management** policy requires a comprehensive due diligence process prior to the execution of the contract. We have specifically addressed the issue of Modern Slavery within our terms and conditions of contract, to ensure that our Third Parties are in compliance with the UK Modern Slavery Act 2015. This includes the requirement that Third Parties conduct regular Modern Slavery risk assessments within their own operations and supply chains, implement appropriate controls to prevent Modern Slavery and notify AIB Group immediately if they become aware of any instances of Modern Slavery within their own operations and/or supply chains.

### **Assessment of Modern Slavery risk within our Supply Chain**

In 2016, we completed a risk assessment of our Third Parties focusing on geographical risk, industry/sectoral risk and the use of temporary workers. A written communication was issued to all Third Parties considered by the Bank to be high/medium risk, outlining our zero tolerance approach and seeking confirmation of their compliance with applicable regulations regarding Modern Slavery (including the UK Modern Slavery Act 2015).

In 2018 we underpinned this review and compliance with the Modern Slavery Act:

- Revised and updated all relevant internal policies, including the Code of Conduct
- New and renewed contracts specifically address Modern Slavery within the terms and conditions of contract
- All Third Parties in the AIB Top Tier have attested to compliance with key policies, including a section specific to Modern Slavery

### **Modern Slavery Awareness**

- AML/CFT Bulletin issued to all AIB employees focusing on Modern Slavery (Definition, Vulnerable Businesses, Responsibility)
- All staff have completed online training on key internal policies, including the Code of Conduct
- Localised training and awareness campaigns
- We have also encourage staff to raise concerns through our “Speak Up” policy

## **Assessment of the effectiveness in preventing Modern Slavery**

Our approach to Modern Slavery risk will evolve and we will continue to mitigate this risk into the future. In 2018 AIB began a process which culminated in 2019 with the launch of the new AIB Third Party Management Policy and Standards. This approach requires all new and renewal of Third Party Relationships to go through a comprehensive Risk Assessment process. The Risk Assessment includes the requirement for Third Parties to provide relevant information in relation to their own policies and those of Fourth Parties, where services have been sub-contracted.

This statement was approved by the Boards of Allied Irish Banks,plc. and AIB Group (UK) p.l.c

Allied Irish Banks, plc  
12 December 2019

AIB Group (UK) p.l.c.  
28 November 2019

## SCHEDULE 1

### AIB Companies which do business in the UK

Aberco Limited

AIB p.l.c.

AIB Group (UK) p.l.c.

AIB UK Loan Management Limited

First Trust Financial Planning Limited

First Trust Financial Services Limited