



## ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to the *Trafficking in Persons (Prohibition) Enforcement and Administration Act 2015* and the *United Kingdom's Modern Slavery Act 2018*.

Guaranty Trust Bank Limited (the **Bank**), a member of Guaranty Trust Holding Company, is a leading financial institution in Africa, renowned for its strong service culture and innovation.

Established in 1990, the Bank has grown to become one of the most respected and service focused banks, with a presence in the United Kingdom. The Bank offers a wide range of financial services to retail, corporate and institutional customers with a commitment to delivering inclusive, sustainable growth across the markets in which it operates.

The Bank maintains a zero tolerance for any form of modern slavery and is committed to ensuring that our supply chain and business relationships reflect this commitment. Through robust internal policies, vendor standards and continuous diligence, we strive to operate with integrity and promote ethical practices throughout our value chain.

### SUPPLY CHAIN

We are committed to acting ethically in all contracts and relationships in all our operations and the same standards are expected from all our contractors, suppliers and other business partners. We maintain an approved supplier list and conduct extensive screening processes on all existing and prospective suppliers to ensure compliance with relevant laws and regulations and foster trustworthy business relationships. Our supply chains include a wide range of products and services including catering, cleaning, management consultancy, training, IT software and hardware, legal and accountancy/taxation advisory services. These products and services are provided either directly to us or through our vendors.

We recognise that indirect risks may exist particularly within extended or global supply chains and all our suppliers are expected to comply with all national and international laws and regulations.

### GOVERNANCE

The Bank maintains a strong governance framework that supports and emphasises our commitment to ethical conduct, regulatory compliance and the protection of human rights and places a significant importance on tackling any form of Modern Slavery or Human Trafficking. A number of internal policies and controls have been implemented to reflect our position against modern slavery, including but not limited to our Code of Business Conduct and Ethics, Vendors Code of Conduct, and Whistleblowing Policy. These policies and controls are in place to prevent the illegal use of our products and services.



Our standards outline our expectations regarding ethical behaviour, labour practices and compliance with applicable laws. This is supported through communications, established controls and proactive steps to ensure compliance with all Anti-slavery and Human trafficking laws and regulations, which ensure alignment to the organisation's ethical standards.

## **DUE DILIGENCE**

We recognise the importance of proactively identifying and managing risks related to modern slavery and human trafficking within our operations. Our due diligence framework is designed to ensure that we only engage with parties whose values and practices align with our commitment to ethical business conduct and respect for human rights.

The Bank applies a risk-based due diligence approach to identify, assess and mitigate the risk of modern slavery and human trafficking. This includes client due diligence to determine potential exposure to modern slavery risks, client compliance to labour laws, regulatory audits and anti-money laundering controls and regular reviews of internal business operations and supply chain. These are conducted to identify modern slavery risks, including financial transactions that have the potential to be directly tied to modern slavery.

## **TRAINING**

To raise awareness of modern slavery and human trafficking risks, we provide training to our employees. Our online training course has been updated with new content and helps to ensure that all employees are aware of our regulatory obligations and are able to identify any issues regarding modern slavery and human trafficking and raise them appropriately so that concerns can be addressed.

All new employees are required to affirm and annually reaffirm that they abide by the Code of Ethics and provides employees with information regarding how they can ask questions and raise any concerns.

The Bank strives to have transparent operations and supply chains that support the elimination of all forms of forced and exploitative labour and is committed to respecting human rights wherever we do business.

Updated June 2025