



UK Modern Slavery Act 2015

Slavery and Human Trafficking Statement - Gulf International Bank B.S.C.

Financial year

1. This slavery and human trafficking statement relates to the company's financial year beginning 1 January 2016 and ending 31 December 2016.
2. To ensure that the Statement is as up-to-date as possible, we have included steps taken after 31 December 2016 but before our board of directors reviewed and signed off on this Statement.

Introduction

3. We are committed to a programme of continuous improvement in our practices to combat slavery and human trafficking in our supply chains and in our business.
4. We are committed to implementing and enforcing effective systems to counter slavery and human trafficking. We will uphold all laws relevant to countering slavery and human trafficking in all the jurisdictions in which we operate.
5. We are covered by the UK Modern Slavery Act 2015 because:
 - (a) we are a body corporate;
 - (b) carrying on business or a part of its business in the UK;
 - (c) which supplies goods or services; and
 - (d) which has a turnover of over £36 million per year.

Organisation's structure, business and supply chains

6. Gulf International Bank B.S.C. ("GIB") was established in the Kingdom of Bahrain in 1975. GIB is a leading regional bank serving major private-sector corporations, G.C.C. based financial institutions, multinational companies operating in the region and government agencies, and retail customers in the Kingdom of Saudi Arabia. GIB is 97.2 per cent owned by the Public Investment Fund of Saudi Arabia (PIF) with the remaining 2.8 per cent owned by the GCC states.
7. Our suppliers are professional services firms, which include other banks, non-bank financial institutions, third party administrators and custodians, and accountancy firms and law firms. Other suppliers include IT contractors, HR providers and third party commercial real estate, cleaning, office supplies and office services required to support the staff.

Our policies on slavery and human trafficking

8. We have drawn up an action plan of the steps to be taken during the 2017 financial year to confirm that slavery and human trafficking is not taking place in our own business or in our supply chains. A number of our policies apply across the Group and our plans and action have therefore involved working in conjunction with our colleagues at GIB. The action plan includes the following steps:
 - (a) Review existing policies and procedures and insert relevant references to modern slavery, with particular reference to the following policies:
 - (i) Code of Conduct; and
 - (ii) Procurement Policies.

- (b) Review first tier supplier contracts and insert relevant references to modern slavery (where appropriate);
 - (c) Aim to introduce anti-slavery clauses for all first tier suppliers entering new contracts on GIB terms;
 - (d) Conduct a review of first tier suppliers to group them by likely slavery and human trafficking risk;
 - (e) Send self-assessment questionnaires to a sample of our suppliers;
 - (f) Review responses to questionnaires and consider next steps;
 - (g) Conduct an HR audit to ensure we have right to work information for all employees and contractors; and
 - (h) Make training available to its staff to raise awareness.
9. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have existing policies which deal with staff and supplier conduct and our commitment to acting ethically and with integrity in all our business relationships. We will develop these policies to include express references to modern slavery.

Due diligence processes for slavery and human trafficking

10. As part of our initiative to identify and mitigate risk our action plan included:
- (a) compiling a list of all first tier suppliers;
 - (b) a review of first tier suppliers to group them by likely slavery and human trafficking risk;
 - (c) sending self-assessment questionnaires to a sample of our suppliers;
 - (d) a review of the responses to questionnaires; and
 - (e) a consideration of next steps.

Steps taken to assess and manage any risks

11. We prepared a list of our suppliers for review. In terms of priority, we decided not to concentrate on well-known global institutions on the basis that such institutions are likely to be covered by the Modern Slavery Act 2015 requirements directly and/or will most likely have established policies and procedures in place which relate to the elimination of modern slavery. Instead we decided to focus on smaller companies with less standing and who offered the types of services which might present a higher risk for example, organisations without large administrative resources which are employing or engaging lower paid and lower skilled workers.
12. We have a dedicated working group, which consists of representatives from the following departments:
- (a) Legal;
 - (b) Human Resources;
 - (c) Compliance; and
 - (d) Procurement.
13. The working group reports to the Group Chief Human Resources Officer who has overall responsibility for the company's response to the challenge of slavery and human trafficking.

Effectiveness

14. It is too early to say with any certainty how effective the steps we are taking have been and will be in ensuring that slavery and human trafficking is not taking place in our business or supply chains. Our determination is that we are of a low risk of any connection to modern slavery and human

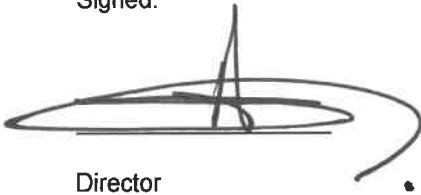
trafficking, given the sector in which we operate, although we do have suppliers and affiliate companies around the world, and in particular in the GCC.

15. It is also our assessment that our suppliers are low risk, given that they are mostly professional services firms, which include other banks, non-bank financial institutions, third party administrators and custodians, and accountancy firms and law firms.

Training

16. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, our action plan includes training of staff scheduled for November 2017.
17. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It has been approved by the board of Gulf International Bank B.S.C. and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2016.

Signed:

A handwritten signature in black ink, consisting of a large, stylized 'A' with a horizontal line through it, and a long, sweeping flourish extending to the right.

Director

Name: **Abdulaziz A. Al-Helaissi**

GULF INTERNATIONAL BANK B.S.C.

Date: 29/10/2017