

2019 SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Bank of Beirut (UK) Ltd during 2018, to prevent modern slavery and human trafficking in its business and supply chains.

Brief description of the Bank's business model and supply chain relationships

Bank of Beirut (UK)'s business is centred on providing trade finance and other banking services to clients whose business is centred on African and Eastern Mediterranean markets. In some cases corporations involved in the supply chain are also clients of the bank.

The Bank also purchases goods and services in its own right and has commercial and in many cases contractual relationships with these entities.

The Bank's policies relating to modern slavery

Bank of Beirut (UK) Ltd has no tolerance to slavery, servitude, forced labour and human trafficking (Modern Slavery) and seeks to avoid partnering with businesses that do not embrace the principles and aims of the Act. This statement reflects the above policy which is approved by the Board of Directors and subject to regular (at least annual) renewal by the Board. Adherence is also subject to assurance work carried out by an independent Internal Audit department.

Training

All members of staff are provided with a briefing explaining their Modern Slavery obligations.

Risk Assessment – Bank of Beirut (UK) Ltd

The Business

Based on a review of our locations, recruitment practices and roles within the business, combined with our policies and the availability of our Whistleblowing Hotline, we are confident that the risk of modern slavery within Bank of Beirut (UK) Ltd is very low.

The Bank provides services to international banks and corporations in or trading with countries that are regarded as higher risk jurisdictions. In its core trade finance activity, the Bank facilitates financial flows in relation to a supply chain rather than dealing with actual goods and services moving through it and as a result cannot guarantee that slavery does not exist anywhere in the chain. However, a risk-based approach to assessing clients and transactions is in place with higher risk situations subject to enhanced due diligence and escalation to independent control functions and senior management sign-off on all new relationships.

The Bank's own supply chain

Bank of Beirut (UK) Ltd sources goods and services from both UK based and international partners to support the delivery of its banking services, including from the following sectors:-

- Information & Communications Technology (ICT) - software, hardware, telecoms
- Property and Facilities - office furniture and maintenance services
- Professional Services – legal and regulatory consultancy, ICT support

We have reviewed our supplier relationships to consider the steps they have taken to ensure modern slavery does not exist within their business and supply chain. As a matter of policy, where it is not included in their standard terms and conditions document, we will ask new suppliers to confirm that they abide by the Act.

Evolving Approach

We are committed to continuing to develop our understanding of the issues and mitigating the risks involved in modern slavery. We will continually review our policies, processes and controls, and improve the mapping of our supply chain to identify areas of high risk.

This statement has been published pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Bank of Beirut (UK) Ltd's Slavery and Human Trafficking Statement for the financial year ending 31 December 2018.

APPROVED BY THE BOARD OF DIRECTORS ON 2nd JULY 2019
