



Standard Advisory London Limited

1. Financial year

- 1.1 This slavery and human trafficking statement relates to the company's financial year beginning 1 January 2017 and ending 31 December 2017.

2. Introduction

- 2.1 We are committed to taking steps to ensure that modern slavery and human trafficking is not taking place in any part of our business and in any of our supply chains. We expect all of our employees to work with us to maintain these standards and to conduct themselves in such a way to ensure that they are in no way connected with modern slavery either through the commission of a criminal offence or through actions or omissions that might bring themselves or us into disrepute
- 2.2 We are committed to a programme of continuous improvement in our practices to combat modern slavery and human trafficking in our supply chains and in our business.
- 2.3 This year we have developed our Anti-Slavery and Human Trafficking Policy and incorporated it with our existing policies and Code of Ethics as the underlying ethos on which we do business. We have commenced due diligence of our supply chain and will continue to undertake due diligence as outlined below.
- 2.4 It is our policy to conduct all our business ethically and in accordance with the UK Government's Modern Slavery Strategy, as amended from time to time, and as outlined in the UK Home Office Guidance "*Transparency in Supply Chains: a Practical Guide*" published on 29 October 2015.
- 2.5 We will uphold all laws relevant to countering slavery and human trafficking in all the jurisdictions in which we operate. We understand that 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) have a turnover of over £36 million per year.

3. Organisation's structure

- 3.1 We are a part of the Standard Bank Group, and our parent company is Standard Bank Group Limited, a company incorporated in South Africa and listed on the Johannesburg Stock Exchange.



4. Our business

4.1 As part of the Standard Bank Group, we predominantly offer: (i) the corporate and investment banking services of Standard Bank Group to institutional and corporate clients; (ii) transactional products and services to multi-national corporates and non-governmental organisations; and (iii) personal banking services as part of Standard Bank Group's wealth management business line. In undertaking our activities we are authorised and regulated by the UK Financial Conduct Authority.

5. Our supply chains

5.1 Our supply chains includes a wide range of products and services including catering, cleaning, management consultancy, training, IT software and hardware, legal and accountancy advisory. These products and services are provided either directly to us or through our affiliates. All of our suppliers are expected to comply with all local and national laws and regulations. We are committed to acting ethically in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter slavery and human trafficking. We expect the same standards from all of our contractors, suppliers and other business partners.

6. Our policies on slavery and human trafficking

6.1 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. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

7. Due diligence processes for slavery and human trafficking

7.1 Our Anti-slavery Policy is a first step towards the company having in place systems to:

- (a) identify and assess potential risk areas in our business and supply chains;
- (b) mitigate the risk of slavery and human trafficking occurring in our business and supply chains;
- (c) monitor potential risk areas in our supply chains; and
- (d) protect whistleblowers.

7.2 Our suppliers are procured in accordance with our Group and our own procurement policies and procedures and vetted by our Procurement team. Our procurement process includes vetting new suppliers based on the nature and value of the products and services provided and as part of that process we require suppliers to provide information about anti-bribery and corruption controls and corporate responsibility.



- 7.3 We continue to review our procurement processes:
- (a) to continue to identify and assess any key risk factors in our supply chain;
 - (b) to implement contractual changes with suppliers to ensure effective controls exist to ensure slavery and human trafficking does not take place in our supply chain;
 - (c) to ensure all those in our supply chain and contractors comply with our values and ethics we will be designing and rolling out in our supply chain compliance programme.

8. Effectiveness

- 8.1 No slavery and human trafficking has been identified in our business or supply chains and we continue to strive to maintain effective prevention and detection controls.
- 8.2 We have principles that assist decision-making in the event of a breach of policy, for example, we have a critical incident response plan. Also any breach of the policy by an employee may be dealt with under our disciplinary procedures and could result in dismissal.

9. Guidance

- 9.1 We provide more specific guidance to those members of staff through whom the steps taken by us in compliance with this Policy are most likely to be taken. The aim of the guidance is to ensure a high level of understanding of the nature of modern slavery and the influence we are able to bring to ensure that it does not occur within any part of our business and in any of our supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It has been approved by the board of Standard Advisory London Limited and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2017.