



Modern Slavery Act 2015

Slavery and Human Trafficking Statement – Gulf International Bank (UK) Limited

Financial year

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

Introduction

2. As per our statement of last year, 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. It is our policy to conduct all business ethically and in accordance with the UK Government's Modern Slavery Strategy and as outlined in the UK Home Office Guidance "Transparency in Supply Chains: a Practical Guide" published on 29 October 2015 as those documents are amended from time to time.
3. 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 will uphold all laws relevant to countering slavery and human trafficking in all the jurisdictions in which we operate.
4. 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

5. Gulf International Bank (UK) Limited ("GIB (UK)") is a wholly owned subsidiary of Gulf International Bank BSC ("GIB"). GIB was established in the Kingdom of Bahrain in 1975 and commenced operations in 1976. GIB is a leading investment grade merchant bank serving major private-sector corporations, Gulf based financial institutions, multinational companies operating in the region and government agencies. 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.
6. The Asset Management division of GIB is managed through GIB (UK). GIB (UK) was incorporated in England and Wales on 22 August 1975. The current business structure of GIB (UK) was created following an acquisition in 2000 of the asset management and corporate finance specialist Saudi International Bank ("SIB") by GIB BSC. SIB was established in the UK in 1975 as a joint venture by the Saudi Arabian Monetary Agency (50%) and a group of leading international banks, of which JP Morgan was the largest shareholder. SIB has been providing portfolio management for clients since 1978. Today, GIB (UK) manages circa US\$15.59 billion of assets on behalf of institutional clients hence is one of the largest GCC owned third party fund managers in the GCC.

7. For the purposes of the EU Alternative Investment Fund Managers Directive (Directive 2011/61/EU) ("AIFMD"), GIB (UK) Alternative Investment Management Limited is the Investment Manager and the AIFM for GIB Trade Finance SPC, our open-ended trade finance fund registered as a segregated portfolio company in the Cayman Islands, and GIB Emerging Markets Opportunities Fund Limited, our open-ended mutual fund registered as a limited liability company in the Cayman Islands.
8. 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

9. During this financial year we took various steps in relation to our policies in order to ensure that they covered modern slavery. These steps included:
 - (a) Reviewing pre-existing policies and procedures to insert relevant references to modern slavery, with particular reference to the following policies:
 - (i) Code of Conduct; and
 - (ii) Procurement Policy;
 - (b) Reviewing supplier contracts;
 - (c) Developing anti-slavery clauses for suppliers entering new contracts on GIB terms;
 - (d) Conducting a review of first tier suppliers to group them by likely slavery and human trafficking risk;
 - (e) Receiving confirmation from the Human Resources department that we have right to work information for all employees and contractors; and
 - (f) Carrying out staff training to raise awareness.
10. 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.

Due diligence processes for slavery and human trafficking

11. During this financial year we took various steps in relation to our due diligence processes for slavery and human trafficking. As part of our initiative to identify and mitigate risk we:
 - (a) compiled a list of all first tier suppliers;
 - (b) reviewed our first tier suppliers to group them by likely slavery and human trafficking risk; and
 - (c) inserted anti-slavery clauses for suppliers entering new contracts with GIB.

Steps taken to assess and manage any risks

12. During this financial year we took various steps to assess and manage any risks. Having prepared a list of all of our suppliers for review, 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.

13. We also established a working group, which consists of representatives from the following departments:
 - (a) Legal;
 - (b) Human resources;
 - (c) Compliance; and
 - (d) the Chief Operating Officer.
14. The team reports to the Chief Executive Officer of GIB (UK) who has overall responsibility for the company's response to the challenge of slavery and human trafficking and in accordance with the requirements of the Act has signed this statement below.

Effectiveness

15. 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 which may be viewed as a higher risk location.
16. 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.
17. We have however, helped through our actions to date to raise awareness of modern slavery issues within our workforce and supply chain.

Training

18. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, in this financial year our external legal advisor attended the London office of GIB (UK) and delivered training to all staff.
19. 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 UK Limited and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2017.

Signed:



Director

Name: Katherine Garrett-Cox

GULF INTERNATIONAL BANK (UK) LIMITED

Date: 29 JUNE 2018