

# Slavery and Human Trafficking Statement 2022-23



بنك الرياض  
Riyad Bank

# Statement Governance Information

Date	Approval
April 2023	<b>Abdulaziz Al-Khereiji,</b> Chief Manager, Riyad Bank London Branch & SVP Overseas Branches
19th June 2023	This statement, has been considered and approved by Riyad Bank's Board of Directors. This statement was signed on the behalf of the Board of Directors of Riyad Bank by <b>CEO Tareq A. Al-Sadhan</b>

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## Our Commitment to You

The Slavery and Human Trafficking Statement 2022-23 has been published in accordance with the UK Modern Slavery Act 2015. This statement, covering April 2022 to March 2023, describes the steps and methodologies we have taken to combat slavery and human trafficking.

Riyad Bank London Branch ("**RBL**" or "**the Branch**") is committed to taking appropriate steps to ensure, to the best of our knowledge, there is no known slavery and human trafficking in our own business or our supply chains.

Riyad Bank is one of the largest Financial Institutions in the Kingdom of Saudi Arabia and the Middle East, providing a comprehensive range of banking products and services to meet the needs of both Retail and Corporate customers. Riyad Bank is publicly listed on Tadawul (Saudi Stock Exchange). In addition to the Branch in the United Kingdom ("**UK**"), Riyad Bank has an international presence in the United States of America ("**US**") and Singapore.

## Disclosure of Instances of Modern Slavery

RBL is unaware of any instances of modern slavery, within its own business or supply chains, during the period April 2021 – March 2022.

## Our Organisational Structure and Business

RBL is a Wholesale Corporate Banking Branch in the UK with vast experience in providing financial services (loans, bank guarantees and fixed deposits) to large corporate clients with business connections to the Kingdom of Saudi Arabia. RBL does not provide Retail Banking. The Branch is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority ("**FCA**") and the Prudential Regulation Authority ("**PRA**").

## RBL's Supply Chains

**As a small UK Branch and Financial Institution, RBL has a small number of suppliers and simple supply chains. Our principal suppliers include:**

- Technology service providers, providing software, equipment and other technology solutions essential in delivering services to our clients;
- Providers of professional services, such as insurers, professional advisors (e.g. legal, regulatory, audit), training providers and recruitment agencies; and
- Businesses which support our day-to-day operations and help us run our London Branch Office premises, such as facilities management services (e.g. cleaning and security providers), couriers and printing services.

In light of our simple supply chains and the nature of our business, RBL considers the risk of modern slavery occurring within our business and/or our supply chains low.

# Our Policies and Procedures in Relation to Slavery and Human Trafficking

In addition to our Slavery and Human Trafficking Statement, Riyadh Bank and/or RBL has the following programs, policies, procedures and guidance in relation to slavery and human trafficking:

- Corporate Social Responsibility program;
- Code of Conduct;
- Principles of Conduct and Business Ethics Policy;
- Conduct Risk and Reputational Risk Guidance;
- Suspicious Activity Reporting;
- Whistleblowing and Supplementary Guidance;
- Outsourcing and Third-Party Risk Management Procedures;
- Right to Work Checks;
- Employment Handbook;
- Employee Compliance Handbook; and
- Employee Financial Crime Handbook.

Riyad Bank is committed to complying with all applicable laws and regulations and to the concept of **"Social Responsibility and Community Service"**. Further details of Riyadh Bank's Corporate Social Responsibility vision can be found here.

## Riyad Bank Values:

 **We Care**

**We Win**

**We are One Team** 

Riyad Bank is dedicated to acting ethically, and with integrity, in all our business relationships. The Bank has strong values to encourage employees to work together and to care about each other, our clients and the community. RBL is committed to implementing and enforcing these values through effective systems and controls to ensure slavery and human trafficking is not taking place, in our business or supply chains, to the best of our knowledge. Riyadh Bank has a Code of Conduct, Principles of Conduct and a Business Ethics Policy, applicable globally. Additionally, RBL's employees adhere to its own Code of Conduct, Conduct Risk Guidance, Reputational Risk Guidance and Suspicious Activity Reporting mechanisms.

Riyad Bank is steadfast in its commitment to comply with the highest possible standards of honesty, credibility, and organisational accountability. Riyadh Bank strives to create an environment based on sound governance principles and transparency rules by identifiable core values. All employees of Riyadh Bank are obliged to adhere to high standards of conduct and ethics, with the group Whistleblowing Policy providing details of how potential or actual violations, risks, or malpractice can be reported by stakeholders on a confidential basis. RBL also has supplementary Whistleblowing Guidance ensuring employees of the Branch are aware of how to,

confidentially when desired, speak up with concerns they have in the UK. This would include concerns about slavery or human trafficking. Senior Managers of the Branch are provided with extra guidance, enabling them to encourage employees to act as the 'eyes and the ears' of the Branch and how they should address concerns to inspire a feeling of safety among employees. Regular Whistleblowing and Code of Conduct training further embed the culture of openness and transparency that the Branch endeavours to achieve.

Riyad Bank endeavours to treat all employees with dignity and respect and provide them with a working environment free from discrimination. RBL is a small wholesale Branch with c. 30 permanent employees. The Branch seeks to prevent modern slavery practices, adhering to all applicable employment laws relating to our employees' terms and conditions, including pay, with all our employees being paid at least minimum living wage. When recruiting employees, RBL undertakes identity/documentation checks to ensure potential employees are aged 16 or above and have the right to work in the UK. RBL's employees are informed of their employment rights through various channels, including employment contracts and the Branch Employment Handbook. The importance of a healthy home-work-life balance is conveyed to employees of the Branch, and this message is strongly promoted by the Chief Manager of RBL and its Senior Managers.

The FCA's Senior Managers and Certification Regime ("**SMCR**") means designated Senior Managers at RBL are personally accountable for ensuring adequate systems and controls are in place to detect and disrupt crime, including modern slavery and human trafficking. SMCR also provides an

opportunity to establish healthy cultures and governance in firms at financial institutions in the UK. RBL has developed practices, procedures and policies supporting a Branch-wide culture of compliance. The Modern Slavery Act, and the requirements for the Branch and its employees, are addressed explicitly in RBL's Compliance Handbook. RBL's Financial Crime Handbook outlines the Branch's approach to client due diligence, incorporating modern slavery and human trafficking. RBL's Outsourcing and Third-Party Risk Management Procedures outline the details of supplier due diligence, integrating modern slavery and human trafficking, for the Branch.

RBL's handbooks and guidance are regularly updated, circulated and easily accessible to Branch employees on the RBL SharePoint. All employees must comply with all applicable policies, procedures and guidance and complete annual confirmations that they have done so.

## Due Diligence Processes

The nature of RBL's business means there is a low risk of the Branch becoming involved in modern slavery and human trafficking crimes. Existing financial crime controls at RBL incorporate consideration of modern slavery and human trafficking, for example, screening of suppliers and clients and suspicious activity reporting mechanisms.

RBL has strict onboarding and ongoing due diligence procedures for the Branch's suppliers and clients. This includes measures to satisfy ourselves that suppliers or clients do not subject anyone to modern slavery and human trafficking. Slavery and human trafficking statements are obtained for all to which they are applicable.

RBL has a zero-tolerance approach to participation in modern slavery and human trafficking and will not knowingly support business with organisations involved in such activities. We partner with suppliers and clients whose ethical principles align with our own. RBL may decide not to proceed with a potential supplier if it cannot satisfy that the potential supplier has undertaken appropriate steps to monitor and mitigate risks from modern slavery and human trafficking. When identified, any modern slavery and human trafficking violations by the Branch's suppliers or clients will require immediate and decisive action by the implicated entity. This may result in the termination of the relationship by RBL if concerns are not addressed.

## Identification, Mitigation and Remediation of Risks

Based on a review of the Branch's business, recruitment practices, and the nature and location of suppliers, combined with our controls (e.g. policies, procedures, and guidance), RBL is confident the risk of modern slavery and human trafficking to the Branch is low.

Except for one media outlet based in the United Arab Emirates ("**UAE**") and a handful of large United States ("**US**") media technology providers, all of RBL's external suppliers are UK-based. The UK and the US are among the top countries globally whose governments are responding well to the risks of modern slavery and human trafficking. International Human Rights group Walk Free's Global Slavery Index 2018 ([globalslaveryindex.org](https://www.walkfree.org/global-slavery-index)) assigned a rating of BBB to both countries. The nature of the goods and services supplied to

RBL are not classed as high risk, with the central area of modern slavery and human trafficking risk for the Branch being the provision of facility management services to the London Branch Office premises.

Relationships with our service providers in this regard are long-established, with the employees undertaking the premises facility management services often being people with whom employees of the Branch are familiar.

## Our Effectiveness in Combating Slavery and Human Trafficking

RBL's risk governance framework utilises the Three Lines of Defence Model. The First Line of Defence is the business itself. Individuals within the first line own and manage modern slavery and human trafficking risk directly, ensuring procedures are followed effectively and reporting suspicions if they arise. The second line (RBL Risk & Compliance Department) monitors RBL's modern slavery and human trafficking controls and risks to determine whether controls and procedures work effectively.

RBL's Risk & Compliance Department undertakes a number of checks under the Branch's ongoing Compliance Monitoring Programme to ensure the established due diligence controls relating to modern slavery and human trafficking are adhered to.

As a predicate offence to money laundering and other financial crime, modern slavery and human trafficking form part of RBL's Anti-Money Laundering ("**AML**")/Counter-Terrorist Financing ("**CTF**") framework. Risks have been added and assessed under RBL's 2022 Business Wide Risk Assessment of Anti-Money Laundering and Sanctions



**(BWRA).** The BWRA is updated on an annual basis.

RBL undertook a Themis end-to-end risk assessment of financial crime exposure, including Modern Slavery, at the end of 2021. Themis is a financial crime technology firm which has partnered with the UK's Independent Anti-Slavery Commissioner, the UK's Cabinet Office and the UK's Department for Business, Energy and Industrial Strategy to launch a year-long (from Q2 2022) UK government-led, nationwide campaign to stamp out modern slavery and human trafficking, across the UK financial services sector. Themis scored RBL an A- in its anti-financial crime capability and control maturity in modern slavery and human trafficking.

During the period (April 2022 – March 2023), no incidents of slavery or human trafficking were recorded through RBL's whistleblowing processes or came to the Branch's attention through its other systems and controls, including suspicious activity reporting, in this area.

## Training and Resources

Employees have been equipped with how to spot warning signs that may indicate labour exploitation and how to report concerns.

RBL includes modern slavery and human trafficking awareness training for all new employees joining the Branch as part of its induction programme.

Riyad Bank has further increased the awareness of modern slavery and human trafficking among all employees. Under

the instruction of the Riyad Bank Board, the subject has been included in annual mandatory training undertaken by all Bank employees worldwide, from 2021. RBL employees (excluding those that are long-term absent) have completed Riyad Bank's annual mandatory training during Q4 2022.

## Steps Taken During 2022-23

### Mapping Industries and Products against Predicate Offences

During Q1 2023, RBL mapped the industries of its clients and the Branch's products against predicate offences, including modern slavery and human trafficking. 93% of the clients RBL work with are considered by the Branch to be operating in industries of medium risk from modern slavery and human trafficking, with 5% high risk and 2% low risk. All of RBL's financial products are considered at low risk from modern slavery and human trafficking.

### Third-Party and Outsourcing Risk Management

RBL expects all third-party suppliers and service providers to conduct their own business in a lawful and ethical manner, including adopting good practices that prevent and eliminate modern slavery and human trafficking. During Q2 2022, RBL's new Third Party Risk Management Platform went live.

RBL has a small number of suppliers and simple supply chains; nonetheless, the platform assists the Branch with meeting the expectations of Regulators to monitor and assess the risks of third-party suppliers and service providers. In terms of modern slavery and human trafficking,



the platform not only assists in ensuring contracts are kept up to date, but the efforts taken by the Branch to assess and mitigate third-party risks are added to each entity within the platform. If there are concerns about any third-party, RBL can send a modern slavery questionnaire to the vendor to further assist in the assessment.

### **Employee Procedures and Guidance**

All procedures and guidance mentioned within this Statement were kept up-to-date during the period.

The Branch undertakes an annual culture survey of employees. For 2022, all employees agreed or strongly agreed that they were aware of RBL's Code of Conduct and Whistleblowing procedures. Employees also agreed, or strongly agreed, that they would feel comfortable raising concerns to an RBL Manager or, if necessary, the Branch's Whistleblowing Champion. Responses to the culture survey are made on an anonymous basis. The survey outcome is shared with the Branch employees at a staff meeting and stakeholders in Riyadh Bank Head Office, such as the Head of Compliance and the Chief Corporate Banking Officer.

### **Future Steps**

RBL remains committed to developing our understanding and mitigation of the risks involved in modern slavery and human trafficking. The Branch will continue to regularly review guidance and processes to identify additional steps it can take to address the risk of modern slavery or human trafficking within its own business and supply chains.

Riyad Bank continues to be highly committed in its strong focus on embedding the Bank's core ethical values throughout the group globally.



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