



MODERN SLAVERY ACT STATEMENT

ANTI-SLAVERY COMMITMENT

First National Bank Ghana Limited (a subsidiary of the FirstRand Group) is a licenced Financial Institution to carry on the business of banking in Ghana.

First National Bank Ghana (FNBG) seeks to conduct its business in compliance with legislation and regulations. This statement constitutes the Bank's anti-slavery and human trafficking statement for the financial year ending 30 June 2022. This statement provides an overview of the steps the Bank has taken to manage the occurrence of slavery and human trafficking risk in its supply chains and in its business.

FNBG adopts a zero-tolerance approach to slavery and human trafficking and will not knowingly hold a direct or indirect relationship with persons or entities engaged in slavery or human trafficking.

Policies

Listed below are the Bank's policies and codes which outline the principles the Bank expects employees, directors, customers and suppliers to align with and adhere to.

- FNBG operates according to a code of ethics which provides guidance on ethical decision-making and behaviour. It creates a common understanding of the behaviour the bank expects from its employees. The code sets standards with regard to promoting and maintaining fair labour practices, respecting human rights and reporting employees who wilfully disregard the rights of people, amongst other requirements.
- FNBG maintains a supplier code of conduct which sets out the minimum standards that FNBG expects from all its suppliers. FNBG requires all suppliers to refrain from any form of slavery and to actively monitor and prevent modern slavery in their own supply chains.

Supplementary controls

FNBG aims at updating its supplier contracts to include clauses that outline the obligations of suppliers. In addition, all FNBG employees have a responsibility to report any actual or suspected forms of illegal, unlawful or unethical conduct to line management or by means of FNBG's Ethics line, in accordance with FNBG's ethics line policy.

Training

FNBG seeks to raise awareness of the issue of modern slavery and human trafficking risk among its employees. To this purpose, general awareness and communication initiatives regarding slavery and human trafficking have commenced and will remain ongoing.

Screening and due diligence

As part of its overall compliance ecosystem, FNBG has adverse media screening standards and procedures in place that are applied to customers and suppliers at onboarding. Ongoing due diligence is also conducted regarding all customers and active suppliers.

DECLARATION

This Declaration was approved by First National Bank Ghana Limited Board, on:

Date Approved: 16 March 2023

Name: Emmanuel Idun

Designation Chairperson