



ARBUTHNOT BANKING GROUP PLC

Slavery and Human Trafficking Statement 2019

This Statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the **Act**) and sets out the steps that Arbuthnot Banking Group PLC (**ABG**) has taken to ensure that slavery and human trafficking is not taking place in any part of its subsidiary businesses or their respective supply chains.

Introduction

ABG does not tolerate modern slavery or human trafficking within its group and is committed to ensuring that the supply chains of its trading subsidiaries are free from slavery and human trafficking. This Statement sets out the actions that ABG has required that its trading subsidiaries take, and continue to take, to ensure that they understand and combat slavery and human trafficking risks within their businesses.

ABG business

ABG is a company registered in England and Wales and is listed on the Alternative Investment Market of the London Stock Exchange (**AIM**). ABG, as a holding company for its subsidiaries, is not a trading business. ABG has a very limited number of direct suppliers and although it is not required to review the nature of these suppliers, as it does not itself supply goods or services, ABG conducts an annual review of its suppliers in the context of the Act. In relation to its trading subsidiaries, they are required to adhere to the requirements of the Act. The individual statement for Arbuthnot Latham and Co., Limited, relating to it and its subsidiaries from time to time (together **AL Group**), can be found on its website www.arbuthnotlatham.co.uk.

ABG requirements for the AL Group's Policy on slavery and human trafficking

ABG requires that AL implements a policy, procedures and processes in relation to the AL Group, which reflects the commitment to act ethically and with integrity, in all their respective business relationships and additionally, to ensure that slavery and human trafficking are not taking place anywhere in the AL Group or the AL Group's supply chain.

Supply chain risk within the AL Group

The AL Group operates within a professional and regulated environment and does not have complex supply chains or obtain material services from suppliers with a high risk of slavery or human trafficking. AL has adopted a risk-based approach to reviewing its existing suppliers and will adopt this approach for any new supplier with which it contracts. The AL Group's Modern Slavery Act Policy is available to all existing and potential new suppliers. Where applicable, contractual provisions will be included in agreements or terms of business with suppliers, which are reviewed on an at least an annual basis.

Due diligence processes for slavery and human trafficking

As part of the ABG initiative to identify and mitigate the risk of slavery and human trafficking, the AL Group is required to carry out appropriate due diligence when engaging and working with suppliers, whilst also ensuring that the diligence undertaken is proportionate to the products or services to be provided and the risk involved.

Training

ABG requires that AL provides training on the requirements of the Act to all its members of staff and those of the AL Group.

Conclusion

We reiterate the commitment of ABG and the AL Group to the Act and its underlying principles.

Review

This Statement has been reviewed by the ABG Board of Directors. It will be reviewed annually and updated as required.

Approval

This statement is made with respect to the financial year ended 31 December 2018 in accordance with section 54(1) of the Modern Slavery Act 2015. It has been approved the ABG Board of Directors and signed by a Director.

Sir Henry Angest

Chairman and Chief Executive

Arbuthnot Banking Group PLC

27 March 2019