



# FirstRand

## MODERN SLAVERY ACT STATEMENT

### ANTI-SLAVERY COMMITMENT

FirstRand Limited (FirstRand or the group) is a portfolio of integrated financial services businesses operating in South Africa, certain markets in sub-Saharan Africa and the UK. Many of these businesses are leaders in their respective segments and markets, and offer a broad range of transactional, lending, investment and insurance products and services.

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

FirstRand 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 group's policies and codes which outline the principles the group expects employees, directors, customers and suppliers to align with and adhere to.

- FirstRand 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 group 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.
- FirstRand maintains a supplier code of conduct which sets out the minimum standards that FirstRand expects from all its suppliers. FirstRand 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

FirstRand continues to update its supplier contracts to include clauses that outline the obligations of suppliers. In addition, all FirstRand employees have a responsibility to report any actual or suspected forms of illegal, unlawful or unethical conduct to line management or by means of FirstRand's whistle-blowing line, in accordance with FirstRand's ethics line policy.

### **Training**

FirstRand 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, FirstRand 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.

### **Industry engagements**

FirstRand is an active member of the South African Anti-Money Laundering Integrated Taskforce (SAMLIT) expert working group on modern slavery and human trafficking, the purpose of which is to increase efficiency and effectiveness in combating financial crime by sharing knowledge and expertise. The outcomes of these engagements include:

- information sharing among member banks, various law enforcement agencies and industry bodies; and
- identification of entities and systems previously unknown to law enforcement in order to contribute to increased enforcement actions.

### **DECLARATION**

This statement has been approved by the FirstRand social and ethics committee on behalf of the board of directors.



### **ROGER JARDINE**

Chairman: FirstRand

1 June 2022