



FirstRand

MODERN SLAVERY 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 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 all relevant legislation and regulations. This statement constitutes the group's anti-slavery and human trafficking statement for the financial year ending 30 June 2024.

FirstRand will not knowingly hold a direct or indirect relationship with persons or entities engaged in slavery or human trafficking and takes reasonable measures to manage and prevent the risk of modern slavery and human trafficking in its supply chain and own business. These measures are detailed below.

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 the group's code of ethics (the code) 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 on promoting and maintaining fair labour practices, respecting human rights, and reporting employees who wilfully disregard the rights of people, amongst other things.
- FirstRand's human rights framework outlines the group's commitment to respecting the human rights of customers, employees, suppliers and other stakeholders across markets in which the group operates. This commitment includes seeking to avoid causing, contributing to, or being complicit in adverse human rights outcomes, including not supporting child labour or forced labour.
- 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 prohibit any form of slavery and to actively monitor and prevent modern slavery in their own supply chains.
- The group has also adopted a policy statement relating to restrictions on the financing of certain sectors/activities. The policy provides guidance on those activities/sectors where financing or investment by FirstRand is excluded or restricted. Excluded activities, which the group will not knowingly finance, include those involving forced labour or child labour, pornography or prostitution, or the mining and manufacturing of conflict minerals, as defined.

Supplementary controls

The above policy commitments are realised through supplementary controls adopted by the group, including:

- ongoing updates of third-party contracts to include suppliers' obligations related to preventing modern slavery and human trafficking in their business, including complying with local laws;

- reporting any unethical conduct or illegal activity, including modern slavery and human trafficking, through the group's ethics line¹, which is managed by an independent third party, or to line management. As per the ethics line policy, FirstRand formally investigates reports and, where appropriate, addresses reported unethical conduct within a reasonable time frame; and
- tracking and reporting suspicious transactions that may involve financial activity linked to modern slavery and human trafficking per recommendations of the Financial Action Task Force and requirements of South Africa's Financial Intelligence Centre Act.

Training and awareness

FirstRand seeks to raise awareness of the issue and risk of modern slavery and human trafficking among its employees. To this end, training and awareness campaigns on modern slavery and human trafficking, and the role of financial institutions in preventing these offences, remain ongoing.

Screening and due diligence

As part of its overall compliance ecosystem, FirstRand has adverse media and sanction screening standards and procedures in place that are applied to customers and suppliers at onboarding to identify potential risks associated with modern slavery and human trafficking. Ongoing due diligence is also conducted on customers and active suppliers.

Where adverse indicators or risks are identified, appropriate risk management measures are undertaken.

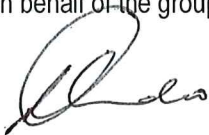
Industry engagements

FirstRand is an active member of the South African Anti-Money Laundering Integrated Taskforce, a working group on modern slavery and human trafficking. The purpose of this working group is to holistically increase industry 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 on modern slavery and human trafficking; and
- identification of entities and individuals allegedly involved in modern slavery and human trafficking and related criminal systems, in order to contribute to increased enforcement actions.

DECLARATION

This statement is reviewed annually and has been approved by the FirstRand social, ethics and transformation committee on behalf of the group's board of directors.



Chair: FirstRand social, ethics and transformation committee

02 October 2024

¹ For details on how to access FirstRand's ethics line, see [Code-of-ethics-2024.pdf \(firstrand.co.za\)](#), p14.