

**T.C. ZIRAAT BANKASI A.S. LONDON BRANCH****MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDED 31/12/2019****ISSUED PURSUANT TO SECTION 54 OF THE MODERN SLAVERY ACT 2015**

Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'. The Modern Slavery Act aims to prevent modern slavery in organisations and their supply chains. We are committed to take all the crucial steps to ensure there is no modern slavery in our own business and our supply chains.

**OUR STRUCTURE, BUSINESS AND SUPPLY CHAINS**

Ziraat Bank London Branch is headquartered in Turkey and operates as a regulated a non-EEA branch in the UK. Ziraat Bank London Branch offers a variety of standard business lines in respect of both retail and corporate customers, such as current accounts, fixed deposits, corporate lending, and Trade Finance. Ziraat Bank London Branch has a relatively simple supply chain, which includes procurement of goods and services in relation to mostly IT and telecommunications, professional consultancy, and facilities management. The branch's key suppliers, contractors, and associated parties are mainly UK incorporated in addition to a limited number of well-established Turkish companies.

**OUR POLICIES**

Ziraat Bank London Branch is committed to acting ethically and with integrity in all our business relationships and we expect our suppliers, contractors, and associated parties to share those values. Ziraat Bank London Branch is fully supportive of the principles underlying the Act and will not knowingly support or do business with any suppliers, contractors, and associated parties who are involved in slavery or human trafficking. Our internal policies and controls relevant to assisting in the prevention, detection, management and reporting of slavery and human trafficking in our supply chain and across our business include policies or controls relating to:

- Anti-Bribery and Corruption Policy
- Supplier/third party management
- Whistleblowing
- Financial Crime Prevention
- Health and Safety Policy
- Code of Conduct
- Fitness and Propriety

Each of the relevant policies is reviewed at least annually and aimed to be further enhanced as appropriate in light of the principles underlying the Act.

### **DUE DILIGENCE PROCESSES**

Ziraat Bank London Branch undertakes due diligence when taking on new suppliers, contractors, and associated parties and when reviewing its existing business relationship.

Examples of such processes:

- Mapping the supply chain to assess particular product or geographical risks.
- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain.
- Taking steps to improve sub-standard suppliers' practices.

### **TRAINING**

Key procurement decisions are made by our Head Office following a tender process, which is facilitated by the Managing Director. Branch staff are not engaged in procurement decisions. Staff who have day-to-day contact with the third parties have taken training to better understand and respond to the identified slavery and human trafficking risks, which includes:

- How to assess the risk of slavery and human trafficking
- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios.

### **OUR EFFECTIVENESS IN ELIMINATING MODERN SLAVERY**

Branch Management is responsible for effective implementation of this Policy. Branch Management ensures oversight via monitoring of key performance indicators we consider necessary to prevent modern slavery and human trafficking from taking place within our business or supply chains. Ziraat Bank London Branch is committed to engage independent assurance to assess our effectiveness in relation to the steps taken to ensure that slavery and human trafficking is not taking place in our business or supply chain.

### **BOARD APPROVAL**

This statement has been reviewed by Ziraat Bank London Branch's senior management and was approved on the 28<sup>th</sup> March 2020.