

This statement is made on behalf of ADFCH BANK LTD and subsidiaries Companies (collectively referred to as “ADFCH BANK LTD”) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes ADFCH BANK LTD slavery and human trafficking statement for the financial year ending 31st January 2016 and forward.

ADFCH BANK LTD is committed to respecting human rights everywhere we operate, consistent with ADFCH BANK LTD’s Vision, Values & Covenants. Within ADFCH BANK LTD and throughout our supply chain, we are committed to treating people with dignity and respect. We expect our business partners, contractors and suppliers to adhere to ethical business conduct consistent with our own.

I. Organisation’s Structure

ADFCH BANK LTD is engaged in Banking, investment, and financial advisory services. We work within a diverse value chain of business partners and suppliers and recognize that each entity in this supply chain has a duty to respect human rights. As customers, we take an active role in communicating our expectations to suppliers.

II. Our Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Policy Against Human Trafficking and Slavery reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Consistent with the principles set forth in our ADFCH BANK LTD Code of Conduct, ADFCH BANK LTD does not tolerate the use of slavery, servitude, forced or compulsory labor or human trafficking in the performance of ADFCH BANK LTD contracts by our employees, our contractors, business partners or suppliers.

Our global supply chain program supports ADFCH BANK LTD goal of ensuring that our suppliers are also committed to acting ethically and ensuring modern slavery and human trafficking is not taking place anywhere in their supply chain or business, including in the recruitment of workers to ADFCH BANK LTD projects.

Our policies seek to prevent modern slavery and human trafficking and our employees are responsible for complying with these policies. ADFCH BANK LTD employees found to be in violation are subject to discipline, up to and including termination.

III. Reporting Violations

ADFCH BANK LTD has resources available to facilitate reporting and protect workers who lodge complaints or report violations. We have an Ethics HelpLine available as a confidential resource at ethics@adfchbank.com or by phone. Where allowed by law, the Ethics HelpLine allows anonymity. ADFCH BANK LTD does not tolerate threats or acts of retaliation against

anyone for raising legitimate concerns. The company is committed to investigating and responding to such concerns in a prompt and responsible manner.

IV. Due Diligence Process

ADFCH BANK LTD has taken several steps to identify, assess, and mitigate the risk of slavery and human trafficking in our supply chain, including the following:

1. We set clear expectations for our suppliers that ADFCH BANK LTD does not tolerate the use of slavery, servitude, forced or compulsory labor or human trafficking, as set forth in ADFCH BANK LTD's Code of Conduct. We expect our suppliers to meet these expectations.
2. ADFCH BANK LTD's standard terms and conditions with suppliers establish our expectations that no slavery is used anywhere in the supplier's business or by any of the suppliers in its own supply chain. Our suppliers agree to comply with all applicable local and national laws and regulations. We have the right to terminate a contract with a supplier for a breach of our terms and conditions.
3. ADFCH BANK LTD has resources available to facilitate reporting and protect workers who lodge complaints or report violations.
4. Workplace conditions audits will be implemented in near future at select sites.

V. Verification of Supply Chain

Our procurement process includes vetting new suppliers and carrying out a risk analysis based on the nature and value of the product or service. Our vetting process includes collecting information from the suppliers, reviewing the supplier's information and background data and performing a risk-based analysis considering the supplier's location and scope of work.

VI. External Engagement

We engage with external stakeholders to inform our risk management, as well as share good practices.

VII. Training

ADFCH BANK LTD employees complete an ethics awareness workshop focusing on the prevention of modern slavery and human trafficking in our supply chains and business. This targeted training is delivered to relevant ADFCH BANK LTD personnel including Human Resources employees and those who may have a greater exposure to these areas of risk in their work.