



Danske Bank

# Modern Slavery Act 2015 - Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2016.

## INTRODUCTION

Northern Bank Limited t/a Danske Bank (the Bank) operates a zero tolerance policy to slavery and human trafficking. The Bank's Modern Slavery Act Policy reflects its commitment to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the Bank's supply chains or in any part of its business.

## THE BANK'S BUSINESS AND ORGANISATIONAL STRUCTURE

The Bank is one of the leading retail banks in Northern Ireland, with 46 branches and 1,514 staff operating in Northern Ireland with one branch in London (UK). The Bank is part of the Danske Bank Group (Group), and its parent company is Danske Bank A/S.

The Danske Bank A/S head office is located in Denmark, and the Group has over 18,500 full-time employees. It serves approximately 3.7m customers in 15 countries.

The Bank is committed to a culture of corporate compliance and strong ethical behaviour.

## THE BANK'S POLICY

The Bank's Modern Slavery Act Policy is underpinned by various policies and procedures which are designed to assist in the prevention, detection, management and reporting of slavery and human trafficking. The Bank's Modern Slavery Act Policy reflects its commitment to acting ethically and with integrity in all of its business relationships articulated in its Supplier Policy, Anti-Money Laundering and Know Your Customer policies and procedures, and in its internal Human Resource (HR) policies and procedures.

## DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of the Bank's initiative to identify and mitigate risk, the Bank carries out appropriate due diligence to:

- Identify and assess potential risk areas in its supply chains;
- Mitigate the risk of slavery and human trafficking occurring in its supply chains;
- Ensure compliance with Anti-Money Laundering and Know Your Customer policies and procedures in relation to account opening for new and existing customers;
- Ensure compliance with all applicable HR policies and procedures relating to recruitment and management of the working environment; and
- Ensure compliance with all applicable anti-slavery and human trafficking laws, including the Modern Slavery Act 2015.

## SUPPLY CHAINS

The Bank's supply chains include third party suppliers for the following goods and services provided to the Bank in respect of:

- Hard and soft facilities management;
- Real estate;
- Consultancy services;
- Recruitment;
- Travel;
- Cash management;
- Marketing and communication;
- Mail and logistics;
- Graphics;
- Banking – market / credit data; and
- IT & telecommunications.

As a financial services provider the Bank does not have a high risk of modern slavery, but operates a risk-based approach to review suppliers who may carry a higher risk of modern slavery. The Bank has systems and controls in place to ensure slavery and human trafficking are not taking place in its supply chains. Systems and controls are reviewed annually and instances of non-compliance are considered a breach of the supplier's contract with the Bank.

To ensure all those in the Bank's supply chain comply with the Modern Slavery Act 2015, and our Modern Slavery Act Policy, the Bank has a rigorous supply chain compliance programme. This includes increased awareness of Modern Slavery in its supplier assessment questionnaire and ongoing due diligence. The Bank has also inserted appropriate contractual provisions in its template supply of goods and services agreement that shall be included in all new or renewed contracts for the supply of goods and services to the Bank.

## TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the Bank's supply chains and its business, the Bank provides relevant training to areas of its business where the risk of modern slavery and human trafficking may be discovered or reported.

## OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

The Bank uses the following key performance indicators (KPIs) to measure how effective it has been to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains:

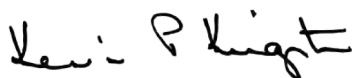
- Due diligence procedures;
- Adherence to the Bank's Modern Slavery Act Policy;
- Contractual provisions in the Bank's template for supply of goods and services agreement;
- Employees can report possible wrongdoings through our Whistleblowing Policy;
- Internal risk based monitoring; and
- Periodic Internal Audit review.

## MORE INSIGHTS

Further information in relation to the Bank's compliance with the Modern Slavery Act can be found on the Group's Corporate Responsibility Report 2016 (available on the Bank's website) and on the Danske Bank Group Website.

## APPROVAL

This statement covers the financial year 1 January 2016 to 31 December 2016.



Kevin Kingston  
Chief Executive