



**招商銀行**  
CHINA MERCHANTS BANK

## Modern Slavery & Human Trafficking Statement 2024/2025

China Merchants Bank London Branch

This statement is made in accordance with section 54 (1) of the Modern Slavery Act 2015 (the 'Act') and applies to China Merchants Bank Co., Ltd ("CMB"). CMB has a strong sense of corporate responsibility and is committed to reducing the risk of slavery and human trafficking taking place in our supply chains or in any part of the business.

### **Structure and Business**

China Merchants Bank London Branch (the "Branch") is a UK establishment of CMB incorporated in China. The Branch was established in October 2016. CMB is authorised and regulated by the National Financial Regulatory Administration, and subject to regulation by the Financial Conduct Authority, and limited regulation by the Prudential Regulation Authority.

China Merchants Bank London Branch provides a range of diversified financial products and services, including but not limited to private banking, syndicated loans, trade finance, allowing it to play a more important role in promoting bilateral trade, services and investment.

### **STEPS TAKEN TO COUNTER MODERN SLAVERY AND HUMAN TRAFFICKING**

#### **Policies**

China Merchants Bank London Branch has a Modern Slavery Policy which is reviewed on an annual basis, and which sets the tone for how the Branch assesses, prevents and mitigates the risk of Modern Slavery in the Branch and within the supply chain in particular. The Modern Slavery Policy is approved by the Management Committee and is signed off by Senior Management.

China Merchants Bank London Branch sets out the minimum standards we expect from suppliers in the Supplier Code of Conduct documentation.

China Merchants Bank London Branch has an anti-money laundering and counter-terrorist financing policy, which is reviewed on an annual basis and describes how the Branch conducts due diligence (including with respect to modern slavery and human trafficking) on customers and transactions. This supports the Modern Slavery Policy.

## **Due Diligence**

As part of the Branch's on-boarding process for suppliers, all new and existing suppliers are required to provide relevant information (including a Modern Slavery Statement, Supplier Code of Conduct and details of location) to the Branch in order for the Branch to understand the supplier's location, supply chains and determine any potential risks linked to modern slavery and human trafficking. If CMB London identifies that one of its suppliers is connected to modern slavery and human trafficking, CMB will cease the relationship with that supplier and make a report to the relevant authorities.

## **Training**

All employees are required to complete training on modern slavery and human trafficking as part of the Branch's financial crime compliance program on an annual basis. We provide both in-house training and external training.

Departments which deal with supplier contracts and relationships are also required to complete further training which is specific to their roles and requirements on an ad hoc basis.

Prevention of modern slavery and human trafficking training will also be mentioned in the Branch training for individual accountability and conduct rules.

## **Whistle-blowing**

China Merchants Bank London Branch is committed to ensuring that all employees are able to seek advice and/ or report any work-related concerns. The Branch's Whistle-blowing policy outlines a confidential process for employees to raise concerns.

## **KPIs**

In order to assess the effectiveness of the measures we have taken we will continue to review the following key performance indicators:

- The number and nature of employee attestations;
- The number and nature of major and minor incidents of non-compliance reported by compliance or internal audit;
- The number and nature of incidents reported through our internal incident reporting (Whistle-blowing) mechanisms;
- Proportion of employees having completed compulsory annual modern slavery and human trafficking training;

- Proportion of suppliers having published a Modern Slavery Statement in line with any obligations under the Modern Slavery Act.

**Feedback**

We are committed to improving our response to the challenges of modern slavery and human trafficking, and welcome constructive feedback from our customers and other stakeholders.

This statement was approved by the General Manager on the 31<sup>st</sup> January 2024.

A handwritten signature in black ink, appearing to be 'Heng Zhang', written in a cursive style.

Heng Zhang

General Manager

China Merchants Bank Co., Ltd London Branch