

BancTrust Investment Bank Limited Modern Slavery Statement 2021-2022

This statement is published in line with section 54(1) of the Modern Slavery Act 2015

About BancTrust Investment Bank Limited

BancTrust Investment Bank Limited (“BancTrust”) is part of a boutique investment banking group that offers investment banking, securities trading, market research and investment advisory products and services to a select base of corporate and institutional clients, mainly comprised of multinationals, financial institutions, asset managers and public sector entities investing in, or operating within, Emerging Markets.

BancTrust is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. We acknowledge the role that we can play to help to bring this about.

We are an equal opportunities employer, fully committed to creating and ensuring a non-discriminatory, inclusive and respectful working environment for all our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We recognise that, as a purchaser of goods and services, we have the opportunity to influence good practices in the employment of people by other organisations.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Here are the steps that BancTrust has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains.

Our supply chain

Due to the nature of our business, we assess ourselves to have a relatively low risk of modern slavery in our business and supply chains. We procure goods and services from the UK and limited numbers of overseas suppliers. Where possible we make full use of approved UK Government Procurement Frameworks.

The financial services companies that we work with in the UK will have fulfilled their statutory requirement to have produced a Modern Slavery Statement.

Our policies which relate to the Modern Slavery Act 2015

The following policies are available to all staff:

- Code of conduct
- Whistleblowing

These policies set out the standards required of our staff and include details of the mechanisms in place which can be used report issues of concern taking place that are linked to our organisation.

Due Diligence

- Through undertaking due diligence in our activity, we seek to ensure that we do not inadvertently support Modern Slavery. We shall make our processes known to potential staff as a means of encouraging good practice.
- We ensure that all staff are legally entitled to work in the UK and that the contract is directly with them.
- We also ensure that any recruitment agency we utilise for the placement of temporary staff follows the same requirements to confirm the identity and right to work of individuals placed with us.
- When we undertake a full public procurement process potential suppliers must self-declare that if they meet the relevant criteria in the Modern Slavery Act 2015
- We will further review our procurement processes to further embed checks on suppliers to ensure compliance with the requirements of the Modern Slavery Act 2025

We will further to embed the principles through 2022 and monitor by:

- providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- ensuring that staff are appropriately trained to look out for signs of modern slavery when engaging with the stakeholders we regulate.
- ensuring that consideration of the modern slavery risks and prevention are added to BankTrust's monitoring programme.
- ensure when undertaking review of relevant HR policies they include the consideration and prevention of risks of engagement of people or groups through Modern Slavery.
- ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices