

MODERN SLAVERY ACT STATEMENT

This statement is made under section 54 of the Modern Slavery Act 2015 (the Act) and constitutes Arab Bank Europe plc and its affiliates modern slavery and human trafficking statement for the financial year ending 31 December 2025. The purpose of this statement is to set out the actions the Bank has taken to prevent any form of slavery in our business and or supply chains.

Organisational structure and business

Arab Bank Europe plc is a UK incorporated and regulated bank headquartered in London.

Arab Bank Europe is a wholly owned subsidiary of Arab Bank, one of the largest financial institutions in the Middle East.

The Bank focuses on providing banking and financial services to our clients and business partners to support transactions between North America & Europe and the Middle East & North Africa region (MENA) in the following three core business areas:

- Corporate and Institutional Banking
- Private Banking
- Treasury

The Bank's Approach

As a financial services provider, our supply chain covers a range of products and services in relation to facilities management, professional consultancy, market data and IT and telecommunications.

The Bank is committed to acting ethically and with integrity in all our business relationships and we expect our suppliers, vendors and contractors to respect human rights and promote similar principles in their own supply chain. The Bank is fully supportive of the principles underlying the Act and will not knowingly support or do business with any suppliers who are involved in slavery or human trafficking.

The Bank is involved in facilitating, lending, investing and protecting money for customers and clients from various sectors around the world. As a financial institution, it is our view that the majority of our exposure to modern slavery and human trafficking is likely to be through our clients and customers.

In the context of modern slavery and human trafficking, we believe that we are most vulnerable through our involvement with construction and hospitality sectors. However, we

are aware that modern slavery and human trafficking can occur in any sector and intend to begin working on accurately identifying areas of highest risk.

Policies and Controls

The Bank maintains policies and controls that are most relevant to assisting in the prevention, detection, management and reporting of slavery and human trafficking in our supply chain and across our business. These include policies or controls relating to:

- Third party management
- Reputational risk
- High risk and unacceptable customers
- High risk countries and industry sectors
- Whistleblowing
- Financial crime prevention including suspicious activity reporting.

Each of the relevant policies is reviewed regularly and will be further enhanced as appropriate in light of the principles underlying the Act where necessary.

The Bank operates a risk-based approach to reviewing suppliers who may carry a higher risk in this respect. The Bank has continued to enhance its third-party management framework which includes affirmation of our commitment to combatting slavery and human trafficking in our supply chain. Part of this Framework requires the Corporate Social Responsibility standing of all suppliers that the Bank deals with to be considered before we would engage with them. This includes but is not limited to, ensuring any supplier the Bank deals with has documented Modern Slavery Policies and whistleblowing policies for example. This framework is subject to regular review to ensure it remains consistent with best practices in reducing the risk of modern slavery.

Staffing

When hiring employees, we only make use of reputable recruitment agencies, who provide the necessary assurances and checks on candidates. We further undertake our own checks including documents checks. Our remuneration policy requires us to pay remuneration in line with market practices, including health and welfare options.

The arrangements with our facilities management service providers for London require these providers to pay the relevant staff at least the London Living Wage.

The Bank has a code of conduct and whistleblowing policy under which staff are required to report any knowledge or suspicion of criminal activity or other wrongdoing, including modern slavery.

Training

The Bank recognises the importance of raising awareness in this area. In 2024 refresher training relating to the issues around slavery and trafficking and the provisions of the Act was rolled out to all staff. New staff are also provided with guidance on related risks and governance policies when they join the bank.

Board Approval

This statement has been reviewed by Arab Bank Europe senior management and was approved by the Bank's Board of Directors in December 2025.

Signed on behalf of the Board of Directors of Arab Bank Europe plc
Haytham Kamhiyah
CEO, Arab Bank Europe plc