



standard
chartered

Standard Chartered Bank Australian Modern Slavery Statement 2020

- ▶ Supporting our clients,
colleagues and communities ▶



Who we are

We are a leading international banking group, with a presence in 59 of the world’s most dynamic markets. Our purpose is to drive commerce and prosperity through our unique diversity. Our businesses serve four different client segments in four regions, supported by nine global functions:

- Corporate & Institutional Banking
- Commercial Banking
- Private Banking
- Retail Banking

We achieve this via 83,657 colleagues and 11,632 non-employed workers¹, spread across our markets. A significant majority of those working for us are skilled professional workers.

1 It includes:

- Non-outsourced NEWs: resources engaged on a time and materials basis where task selection and supervision is the responsibility of the Bank, such as agency workers.
- Outsourced NEWs are arrangements with a third party vendor where the delivery is based on a specific service or outcome at an agreed price, irrespective of the number of resources required to perform the service. These resources are not considered as the Bank’s headcount.

Our client segments

Global

1. Corporate & Institutional Banking

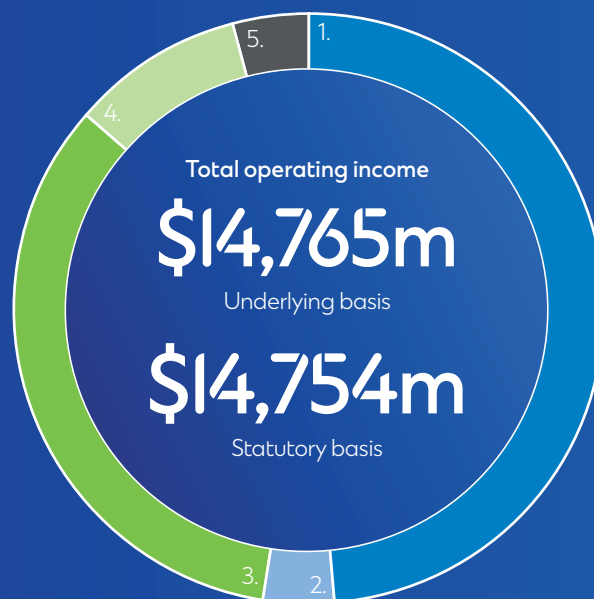
Serving over 5,000 large corporations, governments, banks and investors.

Operating income
\$7,214m **\$7,225m**
 Underlying basis Statutory basis

2. Private Banking

Helping over 7,500 clients grow and protect their wealth.

Operating income
\$540m **\$540m**
 Underlying basis Statutory basis



Local

3. Retail Banking

Serving over nine million individuals and small businesses.

Operating income
\$5,013m **\$5,013m**
 Underlying basis Statutory basis

4. Commercial Banking

Supporting over 45,000 local corporations and medium-sized enterprises across Asia, Africa and the Middle East.

Operating income
\$1,409m **\$1,438m**
 Underlying basis Statutory basis

5. Central & other items

Operating income
\$589m **\$538m**
 Underlying basis Statutory basis

Modern Slavery

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This statement, issued in accordance with the Australia Modern Slavery Act 2018, sets out the steps we have taken during the financial year ending 31 December 2020 to seek to ensure that modern slavery is not taking place in our own operations or in our supply chains.

It is made on behalf of Standard Chartered Bank, which maintains a branch in Australia (ARBN 097 571 778) for the financial year ending 31 December 2020. The Group reports annually pursuant to the UK’s Modern Slavery Act and the statements are published on the Group’s website and the UK government’s Modern Slavery Statement Registry.

Standard Chartered PLC is the ultimate parent company of Standard Chartered and its corporate Group (together “Standard Chartered”, “Group”, “we”, “us”, “our”). References to “SCB” are a reference to Standard Chartered Bank and its owned or controlled entities unless stated otherwise.

We spent around USD 3.7bn in 2020 with around 13,000 active suppliers². We source from all countries in which we operate.

Most of our expenditure is indirect; goods and services that enable our core provision of financial services, rather than goods for resale. We have no inherent seasonality in our sourcing; either in variation of the goods and services we source or the suppliers from whom we source.

² Includes all suppliers that have received a payment in 2020. It does not include suppliers for markets not using e-procurement system (i.e. represent less than 1% of expenditure).

People

 **Colleagues**

83,657

 **Non-employed workers**

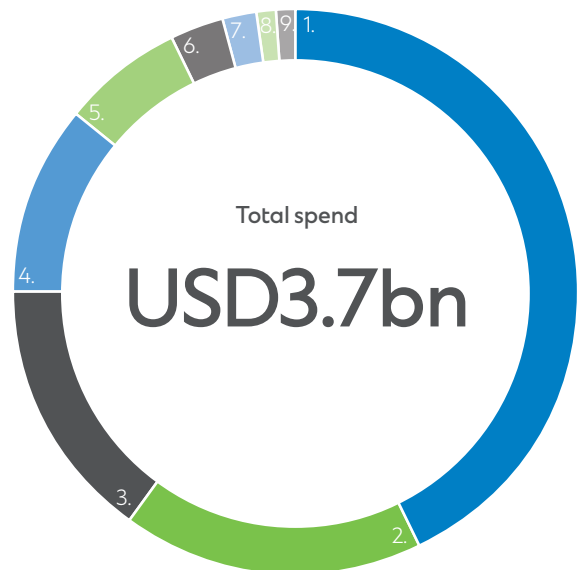
11,632

 **Active suppliers 2020**

around 13,000

Our spend covers the following categories:

- 1. Technology **43%**
- 2. Property **17%**
- 3. Professional Services **15%**
- 4. Marketing **11%**
- 5. HR **7%**
- 6. Banking Operations **3%**
- 7. Travel **2%**
- 8. Office Supplies **1%**
- 9. Others **1%**



Modern slavery risk

In this statement, the term “modern slavery risk” is used to describe the risks of this adverse human rights impacts to people, as opposed to the risks to our business. In reframing the concept of risk in the context of modern slavery, we assess our potential connections to adverse human rights impacts in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs) ‘continuum of involvement’ which specifies three distinct categories of involvement, outlined below:

- Cause: The business’ operations directly result in modern slavery practices.
- Contribute to: The business’ operations or actions in its supply chain may contribute to modern slavery, including through acts or omissions that facilitate or incentivise slavery.
- Directly linked: The business’ operations, products or services may be connected to modern slavery through the activities of another entity it has a business relationship with.

Modern slavery risks in our operations

The majority of Standard Chartered, including SCB, employees perform desk-based roles in offices or remotely. As a financial services firm, our employees are skilled individuals, many with tertiary qualifications. With the exception of a small number of interns, Standard Chartered in any of our offices around the world, does not employ people under the age of 18. These factors, combined with our workplace policies and standards described in more detail under the heading “How we approach MSHT with our workforce”, we consider the risks of having caused or contributed to modern slavery in our workforce to be low.

As a global financial institution, SCB may be linked to modern slavery risks through its financial services and investments. Modern slavery risks exist in almost every sector but are heightened in sectors such as mining, construction, agriculture and manufacturing. The risks tend to be heightened in asset classes within those sectors, particularly in developing and emerging markets where there may be an increased

prevalence of modern slavery. SCB is exposed to each of these sectors. SCB recognises that it may potentially be linked to modern slavery risks via investments and clients in sectors and jurisdictions with increased exposure to adverse human rights impacts. Standard Chartered policies are designed to mitigate these risks.

Modern slavery risks in our supply chain

Our top three supplier categories by spend include technology (44%), followed by professional services (18%), and property (15%). The overall breakdown is shown on the graphic under the heading “How we approach managing modern slavery risks with suppliers”. The production of technology products relies on critical minerals such as cobalt which is known to be linked to the worst forms of child labour and forced labour. There have also been reports of modern slavery-like conditions in factories that manufacture electronic components and other finished goods including merchandise and uniforms. There are also likely to be modern slavery risks deep within the supply chains of the technology brands that form part of our supply chain by virtue of our procurement of technology products.

There are also modern slavery risks such as debt bondage and forced labour in the provision of services reliant on a workforce with low barriers to entry such as cleaning, catering, hospitality, couriers and transportation. These risks are not unique to countries with a higher vulnerability to modern slavery.

As a procurer of the aforementioned goods and services, SCB’s business may be linked to modern slavery via the business practices of its suppliers. However, SCB considers it has a lower risk of causing or contributing to modern slavery in respect of our direct suppliers for the reasons explained under the heading “How we approach MSHT with suppliers”. We recognise the need to increase our engagement with our suppliers to ascertain the risks beyond our first tier, how they manage the risks of modern slavery and to use our leverage to facilitate improvements. Where SCB operates in jurisdictions with a greater vulnerability to modern slavery, there is also a greater inherent risk of modern slavery within our local supply chains in such jurisdictions, particularly beyond its first-tier suppliers.

Our approach

Tackling MSHT³

Through slavery, servitude, forced or compulsory labour and human trafficking, MSHT breaches fundamental human rights. Our roles as an employer, procurer of goods and services and provider of financial services each carry the risk of exposure to these practices. Our broad footprint and our capabilities, particularly in respect of fighting financial crime, gives us the opportunity to raise awareness of, and take steps to tackle, MSHT in a wide range of markets and industries.

Governance

At Group Board level, the Brand, Values and Conduct Committee reviews sustainability priorities and oversees the development of, and delivery against public commitments regarding the activities and/or businesses that the Group will or will not accept in alignment with our Here for good brand promise. This includes oversight on how the Group's Position Statements, including the Human Rights Position Statement, were aligned to the Group's Risk Appetite. The Board Risk Committee (BRC) oversees Reputational and Sustainability Risk as part of the Group's Enterprise Risk Management Framework.

At the executive level, the Group Risk Committee reports into the BRC and delegates the authority to ensure effective management of Reputational and Sustainability Risk, including on human rights issues, to the Group Responsibility and Reputational Risk Committee (GRRRC). The GRRRC oversees the public commitments made in the Statement and receives an update, at least annually, on the assessment of progress and the effectiveness of our actions. Relevant policies are also updated to incorporate commitments and are subject to annual effectiveness reviews.

The GRRRC oversight and guidance process captures all entities within the Group and provides an appropriate forum for consultation with respect to how we manage modern slavery risks across the Group, as reflected in this Statement.

We seek to ensure there is no MSHT in our operations and direct supply chain, and to identify and address MSHT risks connected to our provision of financial services. We recognise this is an ongoing process, as evidenced by our 2020 actions and 2021 commitments detailed under the 'Learning and improving' sections in this document.

Our Position Statement on Human Rights (sc.com/humanrights) was developed following engagement with a range of external stakeholders including expert practitioners and civil society organisations. It was approved by our Group Chief Executive in May 2016 and is informed by a range of international standards including:

In 2020, we started a review of our Human Rights Position Statement. We aim to release an updated Statement in the second half of 2021 after completing a consultation process with experts and stakeholders.

Our Group-wide Code of Conduct reflects our commitments on human rights, confirming that we respect human rights impacted by our activities with colleagues, suppliers and clients. Where adverse impacts occur, we are committed to addressing these.

All colleagues commit to, and undertake online training on, our Code upon joining Standard Chartered and recommit to it annually.

Standard Chartered's Speaking Up Programme was established for use by internal and external parties to report any concerns about misconduct on the part of Standard Chartered employees, its suppliers and subcontractors. Third parties can report relevant information in confidence by using a secure web-based channel (www.intouchfeedback.com/speakingup). The website accepts reports in 13 languages. Reports may also be made anonymously and are investigated by Standard Chartered in strict confidence. The Speaking Up Programme is overseen by senior management and all people leaders are required to complete training on the programme.

We communicate our Speaking Up programme to our suppliers through our [Supplier Charter](#).

During 2020 no Modern slavery and human trafficking (MSHT) cases were brought to our attention through this route.

- International Bill of Human Rights, comprising:
 - United Nations (UN) Universal Declaration of Human Rights
 - International Covenant on Civil and Political Rights
 - International Covenant on Economic, Social and Cultural Rights
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- International Labour Organisation (ILO) Conventions 138 (Minimum Age) and 182 (Worst Forms of Child Labour)
- UN Guiding Principles on Business and Human Rights (the 'Ruggie Principles')
- UN Global Compact
- Thun Group of Banks – The Guiding Principles: an interpretation for banks
- International Finance Corporation (IFC) Performance Standards

Our approach continued

“We recognise the importance of a joined-up approach to addressing MSHT across the organisation”

Learning and improving

We recognise the importance of a joined-up approach to addressing MSHT across the organisation. The MSHT working group (which later became a Human Rights Working Group) carried out a review of our salient MSHT risks and the controls we had in place to guard against negative impacts on people. This included an assessment of country-level MSHT risks in all the markets in which we operate, and how our role as an employer, procurer or financier may connect us to these risks. We detail in the following sections how in 2020 we have continued to take forward the outcomes from this assessment completed in 2017.

The Human Rights Working Group reports to our Sustainability Forum, which, in turn, provides periodic updates to our Group Management Team, and The Brand, Values, Conduct and Culture Committee of the Board.

We also participate in informal discussions with other banks and stakeholders, including hosting workshops to share experiences, best practice and enhance our knowledge of MSHT controls and reporting.

We recognise the financial services sector has a significant role to play in fighting MSHT. For example, we can contribute to the disruption of illicit financial flows by applying our anti-money laundering capabilities to identify and report financial activity connected to the unlawful business model of exploitation.

One of our objectives as a bank is to support partnerships that fight financial crime ([sc.com/fightingfinancialcrime](https://www.sc.com/fightingfinancialcrime)). In recognition of the Group Financial Crime mission to “partner to lead in the fight against financial crime”, since 2014 we have worked to encourage a more coordinated industry approach to the role of financial institutions in identifying and disrupting financial flows linked with MSHT.

Examples of this include our:

- Participation in the Joint Money Laundering Intelligence Taskforce (JMLIT) - the UK’s model for a collaborative approach to tackling money laundering, through a partnership between the UK government, law enforcement agencies and members of the financial sector. We chair the JMLIT’s Expert Working Group (EWG) on Human Trafficking and Organised Immigration Crime, through which we encourage stronger cross-sector partnerships and drive an improved understanding of how financial institutions can disrupt the illicit finances that underpin this criminal business, including developing guidance and materials for wider use.
- Supporting the development of new methods of knowledge exchange on types and indicators of MSHT between NGOs, public sector participants and financial institutions. One of these initiatives, led in coordination with the NGO Stand Together Against Trafficking (STAT), is dedicated to further understanding typologies of forced labour in the fishing industry. Another is an industry wide pilot on the use of an NGO’s Data Hub (Stop the Traffik) to identify suspicious activity, an initiative we continue to support.
- Contributing to other industry initiatives that help develop industry good practice. This has included working closely with NGO The Mekong Club to develop their Banking Baseline Assessment Questionnaire, which assists other banks to understand where they are in the process of developing / enhancing their anti-slavery strategy; delivering training to law enforcement on the value of financial investigation in countering human trafficking, and joining panel discussions hosted by the Chatham House.

Human Rights Working Group Reporting Lines



Contributing functions

Legal	HR	Strategy
Financial Crime Compliance	Environmental and Social Risk Management	Supply Chain Management
Sustainability		

How we approach MSHT with clients

In addition to prohibiting relations with parties known or reasonably suspected to be involved in organised crime including human trafficking, our customer due diligence procedures include requirements to determine the nature of a client's business activities and source of funds/wealth, and media screening of our clients to identify any potential connections to criminality including human trafficking.

We have long-standing environmental and social standards in place for business clients (<https://www.sc.com/en/sustainability/position-statements>). These set clear expectations requiring clients to have appropriate controls in place to prevent modern slavery practices.

“We have long-standing environmental and social standards in place for business clients”

Further, we embed these standards via our systems and practices. As an example, through our trade finance systems, we undertake automated screening of Letter of Credit trade financing, to identify where either the applicant or beneficiary of financing is operating in a high-risk country / commodity combination. This system uses information from the International Finance Corporation (IFC) and World Wildlife Fund (WWF)'s Global Map of Environmental and Social Risks in AgroCommodity Production (GMAP). A report is generated monthly to provide post-issuance transaction screening across all global markets for high-risk combinations. This helps support our client due diligence and consider whether they have reasonable controls in place to manage risks including modern slavery.

Where we identify, or others bring to our attention, that MSHT practices are or may be occurring, we will investigate and work with our clients to ensure they are able to stop these practices, prevent recurrence. Where we cannot get the necessary level of comfort that sufficient safeguards and remediation are in place, we will exit the client. Our relationship managers receive training via a variety of methods including face-to-face, webinar and online, to help them engage with clients. In 2020, we trained 1,604 staff on environmental and social risk management, moving to virtual training when COVID-19 constrained our ability to deliver in-person training.

Textile manufacturing client

A media article revealed that a textiles company in Asia was being investigated in connection with allegations of workers paying illegal recruitment fees to secure their jobs and passport retention. Standard Chartered engaged directly with the client which then put in place measures such as installing safety deposit boxes for workers to keep their passports and repaying costs of recruitment to workers in the form of compensation payments. We continue to track implementation of these measures.

Malaysian glove manufacturing

Due to the COVID-19 pandemic, there has been a sharp increase in demand for medical grade rubber gloves and a corresponding focus on the Malaysian Rubber Glove industry as a major supply hub. Allegations were made by local and international media that the sector has poor labour and working conditions, including workers routinely paying recruitment fees, working long hours and having their passports withheld. We took action to address the allegations by asking clients operating in the sector to:

- share their policies and procedures around prevention of forced labour and worker welfare
- share regular audit information, including how effectively their grievance mechanisms are functioning, and whether they are picking up issues before they become material.

In light of the pandemic, clients have also been asked to share their procedures relating to the provision of additional PPE, distancing on transport to factories and other safety measures for workers.

Progress on remedying these issues is tracked on a quarterly basis to ensure full remediation is achieved in line with our zero-tolerance approach to these practices.

During 2020, we included MSHT in the 5th Annual Financial Crime Risk Symposium, which is an internal event hosted virtually this year, which reaches circa 2500+ Surveillance and CCD analysts across the bank. Professor James Cockayne of the F.A.S.T. initiative delivered a bespoke briefing on MSHT red flags.

Learning and improving

We continue to address a number of areas -identified through ongoing review and external engagement- where we could enhance our response.

In 2020 we:

- Included MSHT in the curriculum of the new Financial Crime External Risks bank-wide mandatory eLearning, launched bank-wide at the end of July 2020.
- Included MSHT in the 'Whole Story' Awareness Campaign which ran bank-wide for the whole of August 2020.
- Led and participated in industry outreach including a Chatham House panel discussion "Coordinating the Fight Against Financial Crime" (covering effectiveness, Covid-19 and human trafficking), a roundtable hosted by the UK's Independent Anti-Slavery Commissioners office, and a discussion with the International Justice Mission on potential collaboration on the UN's Liechtenstein initiative (which aims to provide survivors of human trafficking with financial access).
- Led a UK financial industry-wide pilot of the Stop the Traffic 'Hub', which aims to use multiple data sets provided by NGOs and government agencies that will be overlaid with public, open source data to deliver a single repository of information.
- Delivered physical training sessions in six locations (Mumbai, New Delhi, Nepal, Bangkok, Indonesia, Singapore) combined with virtual sessions in the context of Covid-19 travel and convening restrictions. We trained a total of 627 people in environmental and social risks with a core component on MSHT.
- Completed an internal review of potential grievance channels, and handling processes for grievances received via these channels. Engaged an external human rights specialist to conduct an independent review, expected to be completed in Q1 2021.
- Developed and implemented a tracker for MHST issues identified during client and transaction due diligence.
- Implemented control sample checks to ensure that embedded risk assessment checks are working effectively to prevent MSHT in client and transactions.
- Started a cross bank review of clients who may have direct or indirect exposure to regions with outstanding allegations of forced labour. Where there is direct exposure to potential human rights abuses further due diligence will be considered to address the risks.

During 2021, we will:

- Improve our vigilance of high-risk markets and sectors where instances of modern slavery infringements are prevalent, based on research commissioned from a specialist human rights consultancy.
- Update our environmental and social risk assessment process based on the findings of this work and require clients with heightened risk to undertake additional due diligence to ensure they have appropriate systems to manage the risk.
- Enhance and uplift our definition of social risk and incorporate this into governance frameworks e.g. client review committees.
- Undertake a further review of our Corporate, Commercial & Institutional Banking client on-boarding agreements (the 'Regulatory Compliance Statement') to consider any amendments further to the recommendations of the OECD 'Due Diligence for Responsible Corporate Lending and Securities Underwriting'.
- Conduct a review of our approach to the provision of remedy in cases of violations of human rights where appropriate.

4 Our review of MSHT risks and controls during 2017 identified areas for improvement

How we approach MSHT with suppliers

Standard Chartered will not knowingly enter into relationships with suppliers that cause or contribute to adverse human rights impacts including human trafficking, slavery, the worst forms of child labour or forced labour. The Supplier Charter (sc.com/Suppliercharter), includes our expectations that suppliers apply its principles within their sphere of influence such as approved subcontractors. The Charter includes requirements on suppliers to:

- Work to support and respect the protection of human rights in accordance with the UN Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights.
- Prohibit human trafficking, the use of all forms of forced or compulsory labour and any other form of modern slavery within the supplier's own operations.
- Recognise and conform with the rights of colleagues to associate freely and to organise and bargain collectively in accordance within the framework of local laws in which they are employed, recognising the role of International Labour Organisation (ILO) Conventions 87 on freedom of association and 98 on right to organise and collective bargaining.
- Not use child labour and to support effective abolition of child labour, and to take all reasonable steps to eliminate such labour from their supply chain, recognising the role of ILO Conventions 138 on minimum age and 182 on child labour.
- Take all reasonable steps to eliminate forced labour from their supply chain, recognising the role of ILO Conventions 29 and 105 on forced labour.

Our standard contracts contain rights to conduct routine monitoring of suppliers. Those found non-compliant with our standards may face termination of contracts and be excluded from potential engagement opportunities. We seek to monitor supplier compliance with our requirements through regular screening, where contractual arrangements with suppliers allow. Those found to be non-compliant with the human rights / modern slavery principles in our Supplier Charter may face termination of contracts and be excluded from potential engagement opportunities. However, our first preference is to work with the supplier to remediate the identified issues, and terminate supplier relationships only in circumstances where we cannot exercise leverage to get the concern addressed.

We communicate our expectations to our Suppliers through the Supplier Charter at onboarding and remind them of this on an annual basis. Our Supplier Charter is shared with all suppliers on an annual basis.

Since 2018 the scope of our audit includes the wider topics of health and safety, labour practices, fair wage and MSHT. We also used the mapping to support dialogue within our regional Supply Chain Management structure, such as with ASEAN and South Asia, and Africa and the Middle East.

In 2020, we finalised our onsite Social Compliance audit assessment framework that narrows down when and how these assessments should be triggered. This works builds on the monitoring assessment of our strategic suppliers that took place the previous year and will be introduced into the risk management framework in 2021.

Learning and improving

Building on our actions in previous years, we took further steps with the long-term objective of eradicating MSHT from our supply chains.

During 2020, we:

- Enhanced our Supplier Screening configuration on adverse media with additional Modern Slavery flags.
- Updated our SCBuy procurement system, so that supplier engagements in categories with heightened risk of MSHT are identified and escalated for further assessment.
- As part of these enhancements, incorporated specific questions on MSHT which need to be answered and evaluated as part of the due diligence onboarding controls for suppliers with heightened risk.
- Supported these enhancements through new documented responsibilities within our governance controls on MSHT risk within our supplier base, including reflecting these in our Reputational Risk Framework.

During 2021, we will:

- Highlight any Modern Slavery Potential Risk at the onboarding stage of a vendor, and as a result from the Modern Slavery Control Assessments of all High-Risk Categories.
- Enhance our Procurement Category Plans for those categories where Modern Slavery risk is relevant, in alignment to the Banks risk appetite and our Supply Chain Strategy.
- Enhance education and awareness on Modern Slavery across all our Category Managers and Contract Owners through trainings, digital documents, and internal communications.

How we approach MSHT with our workforce

Our workforce includes colleagues employed directly by Standard Chartered, and non-employed workers who are contracted through third parties. We address MSHT with non-employed workers through measures taken with respect to our supply chain, as outlined above.

We maintain and assure policies and procedures which set out how we engage with direct colleagues through hiring, throughout their career and upon leaving Standard Chartered, which include measures that seek to ensure no employee of Standard Chartered is a victim of MSHT practices through their employment.

Our Fair Pay Charter, supports our commitment to deliver fair and competitive remuneration to all colleagues. The Charter clearly sets out the principles we use to guide reward and performance decision-making globally, including commitments around how we set, structure and deliver remuneration.

We maintain compliance with living wages through our hiring and pay review processes. We are mindful that changes in economic conditions can rapidly increase the cost of goods and services. We therefore monitor changing conditions throughout the year to ensure that our commitment remains appropriate, and where required, we provide additional monetary interventions outside of our annual pay review cycle.

In 2020, we conducted a feasibility analysis to establish the extent to which we can extend our living wage commitment to non-employed workers and other third parties, and will start to work through identified actions in 2021.

We have clearly defined processes in place, including our Speaking Up program, to enable colleagues to raise and resolve grievances connected directly with their employment, and have implemented fair and consistent standards where the conduct or performance of colleagues fails to meet expected standards.

Further information on our alignment to the Fair Pay Charter and on how we engage colleagues on fairness, can be found in our Fair Pay Report ([sc.com/FairPay](https://www.sc.com/FairPay)).

“Our Fair Pay Charter, launched in 2018, supports our commitment to deliver fair and competitive remuneration to all colleagues”

Supporting shared action

% of employees committing to the Code of Conduct

99.8%

Number of transaction reviewed by our ESRM team

1,090

Standard Chartered acknowledges we cannot tackle MSHT on our own. Our actions detailed above show how we work with those we have a direct relationship with, and we also promote shared action through collaborative platforms. These include:

Organisation	Basis for partnering	Progress in 2020
Roundtable on Sustainable Palm Oil (RSPO)	Standard Chartered has been an active member of the Round table for Sustainable Palm Oil (RSPO) for many years as we believe that issues relating to modern slavery in the palm oil supply chain require multi stakeholder approaches.	Standard Chartered continues to be on the Board of Governors of RSPO and in this role we will continue to promote awareness and remediation of MSHT issues within the palm oil supply chain.
Thun Group	The Thun Group is an informal group of banks who work together with the purpose of understanding how human rights can best be respected and promoted across the breadth of different banking activities. Standard Chartered has been a participant in the Thun Group since 2013.	During 2020 we continued to lead work within the Thun Group on incorporating human rights considerations into market standard loan documentation.
NGOs and Civil Society	Our key partners in 2020 included the Mekong Club, International Centre for Missing and Exploited Children (ICMEC) and Stop the Traffik. The focus of our engagement with NGOs and other civil society stakeholders on MSHT has been to inform our financial crime fighting work; we also seek opportunities to inform our wider programme on MSHT. We are proud to work alongside several leading NGOs that help strengthen our understanding of the financial flows associated with MSHT, for example any geographic or sector specific characteristics. In turn, we encourage them to consider financial indicators in their analysis and reports.	Our work in 2020 included: <ul style="list-style-type: none"> • Working with the Mekong Club to develop their Banking Baseline Assessment Questionnaire. The Questionnaire assists other banks to understand where they are in the process of developing / enhancing their anti-slavery strategy. • Working with the International Centre for Missing and Exploited Children (ICMEC) to develop a toolkit for banks to assist them to develop their systems, controls and best practices to combat the online sexual exploitation of children, a project expected to complete in 2021. • Leading an initiative in coordination with the Stand Together Against Trafficking (STAT) to develop new methods of knowledge exchange, with a focus on understanding typologies of forced labour in the fishing industry. • Participating in the Traffik Analysis Hub, an initiative led by Stop the Traffik, which shares and develops modern slavery and human trafficking typologies.
The UK's Joint Money Laundering Intelligence Taskforce (JMLIT)	JMLIT is one of several financial crime-fighting financial information sharing partnerships (FISPs) in which we participate. JMLIT provides a framework for exchanging knowledge on key financial crime threats, including MSHT. It helps us enhance our effectiveness in combating financial crimes by improving our understanding of their financial characteristics. It also helps us play an active role in raising awareness among other financial institutions, law enforcement agencies and government bodies of the role that financial institutions can play in countering MSHT. JMLIT was described in 2018 by the Financial Action Task Force as "innovative" and an "example of best practice". We chair the JMLIT's Expert Working Group (EWG) on Human Trafficking and Organised Immigration Crime (HT & OIC) and, as such, play a leading role in bringing together representatives from the public and private sectors to build and share knowledge, and help the financial industry take more effective action against MSHT (sc.com/fightingfinancialcrime/partnerships.html).	In our role as Chair of the JMLIT EWG on HT & OIC, we have helped drive a collective industry response to MSHT, including taking the following steps: <ol style="list-style-type: none"> i. We have continued to develop the Group's forward work plan, aligning intelligence needs of public and private sector. ii. In our role as Chair of the Group we continue to broaden awareness of the role of Financial Information Sharing Partnerships in combatting human trafficking. Actions to support this include training law enforcement in the UK and internationally, as well as with financial institutions in other markets.

Completed eLearning on anti-money laundering

99.9%

The number of staff trained on Environmental and Social Risk Management

1,604

Measuring our progress

We measure how we perform against our standards in a few ways. This includes monitoring:

Measure	2020 Result	2019 Result	2018 Result
Completion of our mandatory eLearning on anti- money laundering, which contains materials on human trafficking	99.9% completion in 2020	99.93% completion in 2019	99.90% completion in 2018
Commitment to the Code of Conduct on an annual basis, and associated training where required	99.8% commitment and recommitment in 2020	99.45% commitment and recommitment in 2019	99.6% commitment and recommitment in 2018
The number of clients and transactions reviewed by our dedicated ESRM team, including predominant sectors and themes	1,090 clients and transactions reviewed in 2020. Predominant sectors included chemicals and manufacturing, and infrastructure and transportation, oil and gas.	1,149 clients and transactions reviewed in 2019. Predominant sectors included chemicals and manufacturing, and infrastructure and transportation.	827 clients and transactions reviewed in 2018. Predominant sectors included chemicals and manufacturing, and infrastructure and transportation.
The number of staff trained on Environmental and Social Risk Management	1,604	1,126	1,308

It also includes documenting our practical experience, such as through the case studies in this document.

We will continue to review these metrics and will introduce new metrics if we find better ways to monitor our progress in addressing modern slavery.

We welcome feedback on our modern slavery transparency statement. Please contact us at sustainability.feedback@sc.com.

Process of consultation

Various business areas and corporate functions within Standard Chartered were consulted in the drafting of this statement, including: Legal, Risk, Human Resources, Supply Chain Management, Financial Crime and Compliance. These groups have global mandates, which includes Standard Chartered Bank and its subsidiaries. Accordingly, these internal stakeholders provided input in relation to Standard Chartered Bank and its wholly owned or controlled subsidiaries.

Approval

This Statement was approved by the Board of Directors of Standard Chartered PLC as the higher entity, on 19 September 2024 and is signed by a responsible member of the Board of Directors, Bill Winters in his role as director and Chief Executive Officer on 19 September 2024.

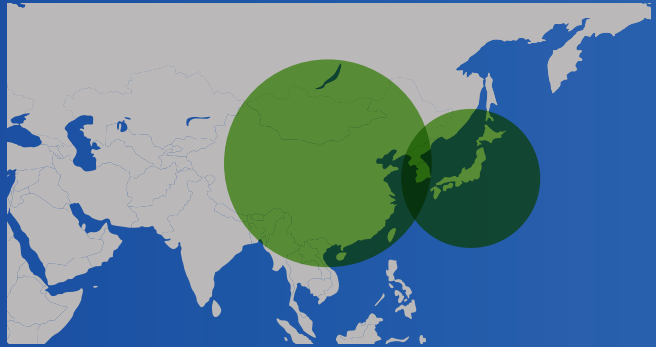


Bill Winters
Group Chief Executive Officer
Standard Chartered PLC

Footprint markets

Greater China & North Asia

Mainland China Macau
Hong Kong Korea
Japan Taiwan



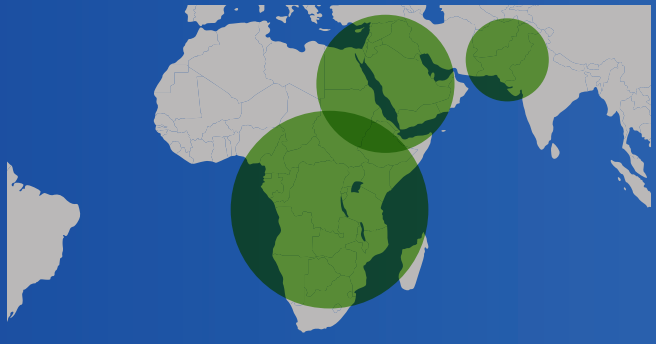
ASEAN & South Asia

Australia Myanmar
Bangladesh Nepal
Brunei Philippines
Cambodia Singapore
India Sri Lanka
Indonesia Thailand
Laos Vietnam
Malaysia



Africa & Middle East

Angola Kenya South Africa
Bahrain Lebanon Tanzania
Botswana Mauritius The Gambia
Cameroon Nigeria UAE
Cote d'Ivoire Oman Uganda
Egypt Pakistan Zambia
Ghana Qatar Zimbabwe
Iraq Saudi Arabia
Jordan Sierra Leone



Europe & Americas

Argentina Jersey
Brazil Poland
Colombia Sweden
Falkland Islands Turkey
France UK
Germany US
Ireland



Annexure:

Reporting Criteria

Mandatory criteria		Page numbers
a)	Identify the reporting entity	3
b)	Describe the reporting entity's structure, operations and supply chains.	2-3
c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	4
d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	5-11
e)	Describe how the reporting entity assesses the effectiveness of these actions.	5,12-13
f)	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the Statement).	13

▶ Let us know
what you think ◀

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