



Modern Slavery Statement

May 2026

Introduction

This Modern Slavery Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken by **FCMB Bank (UK) Limited** (“the Bank”) to prevent modern slavery and human trafficking within its operations and business relationships.

The Bank is committed to improving our practices to combat modern slavery and human trafficking in our business and across all of our business relationships. The Bank continues to ensure that proportionate controls and processes are in place to ensure that the risks associated with modern slavery and human trafficking are reduced and mitigated.

Organisational Structure

FCMB Bank (UK) Limited is an independently incorporated, wholly owned subsidiary of First City Monument Bank Limited, part of the FCMB Group PLC, a financial services group headquartered in Nigeria and authorised by the Central Bank of Nigeria.

The Bank is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. The Bank is incorporated in England and Wales. The Bank provides deposit taking services, corporate lending, buy to let mortgage lending and trade finance to individuals and corporates based in Nigeria and other sub-Saharan countries in Africa.

Modern Slavery Statement:

The Bank has a zero-tolerance approach to modern slavery, human trafficking, forced or compulsory labour, servitude, child labour and any form of exploitation or abuse. This commitment applies to the Bank’s own operations and the Bank’s supply chain, customers, clients, intermediaries, contractors, recruitment agencies and other third-party relationships.

The Bank recognises that modern slavery and human trafficking risk may arise when working with individuals and companies operating in different jurisdictions and sectors. We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

As a regulated financial services firm with a limited supply chain, the Bank focuses on embedding preventative control and due diligence measures with relevant third parties to ensure any modern slavery or human trafficking risks are suitably mitigated.

Due Diligence and Compliance:

The Bank’s principal resource is its people, including directors, employees, contractors, consultants and business partners. The Bank mitigates modern slavery risks within the workforce, through a combination of people practices, third-party due diligence and contractual safeguards.

As part of our initiative to identify and mitigate risk the Bank:

- ensures recruitment, hiring and remuneration practices comply with applicable UK employment and labour laws;
- undertakes risk-based due diligence on third-party suppliers, customers, clients and service providers as part of onboarding and ongoing review processes;



FCMB Bank
(UK) Limited

- includes contractual provisions and standards setting out expectations on ethical conduct, compliance with applicable laws and zero tolerance of modern slavery and human trafficking; and
- ensures relevant protections through its whistleblowing policy

The Bank will be strengthening its approach to the identification and mitigation of risks within the supply chain, with customers and clients in 2026 with a full review of the existing processes and controls.

The Bank does not knowingly support or engage with organisations involved in modern slavery or human trafficking. The Bank shall terminate its relationship with any employee or business found in breach of this policy statement.

Training and Awareness:

The Bank recognises the importance of awareness and capability in preventing modern slavery. Expectations relating to ethical conduct and the treatment of individuals are embedded within the Bank's policies and is monitored as part of the the Bank's risk and compliance frameworks. Training for the Bank's workforce on modern slavery is being rolled out in 2026 to support improved awareness.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the FCMB Bank (UK) Limited slavery and human trafficking statement for the financial year ending 31 December 2025.

This statement has been approved by the Board of Directors of FCMB Bank (UK) Limited and is reviewed annually.

A handwritten signature in blue ink, appearing to read 'A. Maasland', with a long horizontal stroke extending to the right.

Albert Maasland
Chairman of the Board
FCMB Bank (UK) Limited
Approved the the Board on 27 May 2026