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chartered

• Standard  
Chartered PLC  
Modern Slavery  
Statement 2023 •



# About Us

Standard Chartered connects the world’s most dynamic markets, serving the businesses that are the engines of global growth and supporting people to meet their ambitions and serving the businesses that are engines of global growth. Every day, we help clients to manage and invest their finances safely and effectively seamlessly, and grow their businesses and wealth and their businesses with confidence.

Over our 170 year history, and across a unique geographical footprint that connects Asia, Africa and the Middle East to each other and the world, we have built a bank like no other, with diverse capabilities and partnerships that set us apart. Inspired by our brand promise, we are here for good.

We serve three client segments in three regions, supported by eight global functions. We achieve this via more than 85,000 employees and fixed-term workers<sup>1</sup>, spread across our markets.

This Modern Slavery Statement (Statement) sets out the actions we have taken during the year to assess and manage the risk of slavery, forced, bonded or compulsory labour and human trafficking (modern slavery<sup>2</sup>) in our operations and supply chain. It is made on behalf of Standard Chartered PLC (the Group) which includes the following legal entities: Standard Chartered PLC, Standard Chartered Bank, Standard Chartered Holdings Limited, and Standard Chartered Bank Hong Kong Ltd. This is a Statement under the UK Modern Slavery Act 2015 for the financial year ending 31 December 2023. The Statement applies to all companies within the Group that are required to publish a statement as listed under ‘Scope of Statement’ on page 9.

## Our client segments



→ Standard Chartered PLC Annual Report 2023

	Operating income
<b>1. Corporate, Commercial and Institutional Banking</b>	<b>\$11,218m</b> Underlying basis
Supporting clients with their transaction banking, financial markets, corporate finance and borrowing needs, Corporate, Commercial & Institutional Banking provides solutions to nearly 20,000 clients in the world’s fastest-growing economies and most active trade corridors.	<b>\$11,788m</b> Reported basis
<b>2. Consumer, Private and Business Banking</b>	<b>\$7,106m</b> Underlying basis
Serving more than 10 million individuals and small businesses, Consumer, Private & Business Banking focuses on the affluent and emerging affluent in many of the world’s fastest-growing economies.	<b>\$7,151m</b> Reported basis
<b>3. Ventures</b>	<b>\$156m</b> Underlying basis
Ventures promotes innovation, invests in disruptive financial technology and explores alternative business models. It represents a diverse portfolio of over 30 ventures and 20+ investments	<b>\$156m</b> Reported basis
<b>4. Central &amp; other items</b>	<b>\$(1,102)m</b> Underlying basis
	<b>\$(1,076)m</b> Reported basis

<sup>1</sup> It excludes all non-employed workers (NEWs). NEWs are comprised of both outsourced and non-outsourced resources: Non-outsourced NEWs are resources engaged on a time and materials basis where task selection and supervision is the responsibility of Standard Chartered, such as agency workers. Outsourced NEWs are arrangements with a third-party supplier 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.

<sup>2</sup> The Group adopts the definition of slavery and human trafficking from section 54(12) of the UK’s Modern Slavery Act.

# Where we operate

▶ We are present in 52 markets ◀

## Asia

We have a long-standing and deep franchise in some of the world's fastest-growing economies. Our Asia region generates **two-thirds** of our income. The two markets contributing the highest income are **Hong Kong and Singapore**.



Australia	Japan	Nepal
Bangladesh	Korea	Philippines
Brunei	Laos	Singapore
Cambodia	Macau	Sri Lanka
Hong Kong	Mainland China	Thailand
India	Malaysia	Vietnam
Indonesia	Myanmar	Taiwan

## Africa and the Middle East

We have a deep-rooted heritage in Africa and the Middle East. **The United Arab Emirates, Pakistan, Kenya, Nigeria, South Africa, and Ghana** are our largest markets by income.



Bahrain	Kenya	Saudi Arabia
Botswana	Mauritius	South Africa
Côte d'Ivoire	Nigeria	Tanzania
Egypt	Oman	UAE
Ghana	Pakistan	Uganda
Iraq	Qatar	Zambia

## Europe and the Americas

We support clients in Europe and the Americas through hubs in **London and New York** and have **a strong presence** in several European and Latin American markets.



Argentina	Germany	Sweden
Brazil	Israel	Türkiye
Colombia	Jersey	UK
Falkland Islands	Poland	US
France		

# Our approach

We strive to be a responsible company and respect human rights across our business.

Modern slavery represents some of the gravest forms of human rights abuses. We recognise that the global nature of our business may expose us to the risk of modern slavery in our operations, supply chain and client relationships and we are committed to managing and mitigating these risks. This is an ongoing process, as evidenced by the actions detailed within the “Enhancing our approach” sections throughout this report.

## Governance

At Board level, the Culture and Sustainability Committee provides oversight and review of our sustainability strategy, including the Group’s commitment to respect human rights, while 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. Our approach to managing modern slavery risks is guided by the following frameworks and policies:

## Code of Conduct and Ethics

Our Group-wide Code of Conduct and Ethics (the Code) reflects our human rights commitments, confirming our expectation that we respect human rights in our activities with employees, suppliers and clients (<https://www.sc.com/global/av/ke-code-of-conduct.pdf>). The Code requires staff to comply with the spirit and letter of laws and regulations. Accordingly, each of our markets defines their employment practices (e.g., hours, compensation) at a minimum in compliance with local laws. Where adverse impacts occur, we seek to address these in a timely manner. To reinforce our shared commitment to the highest standards of conduct, each year we ask employees to reconsider what the Code means to them and recommit to it through a refresher e-learning module.



## Our approach continued

### Environmental and Social Risk Management (ESRM)

Our approach to managing and mitigating environmental and social risk is reflected in our framework ([sc.com/esriskframework](https://sc.com/esriskframework)). This framework outlines the cross-sector and sector-specific Position Statements that we use to assess whether to provide financial services to our clients. Informed by international best practice and the International Finance Corporation's (IFC) Environmental and Social Performance Standards<sup>3</sup>, our ESRM framework forms part of the credit approval processes for all applicable Corporate, Commercial and Institutional Banking (CCIB) clients and transactions. The framework also applies to advisory services and debt capital market underwriting.

We regularly review our Position Statements to ensure they align with industry best practice and stakeholder expectations. We reviewed and updated all our sector-specific Position Statements and some of our cross-sector Position Statements in 2023 for publication in 2024 and will complete this review in 2024 followed by publication of the updates.

### Position Statement on Human Rights

Our Position Statement on Human Rights ([sc.com/humanrights](https://sc.com/humanrights)) is a key part of our framework and was developed following engagement with a range of external stakeholders, including expert practitioners and civil society organisations. Like our cross-sector Position Statements, the Human Rights Position Statement applies to our clients, suppliers and employees and is regularly reviewed to ensure it addresses emerging risks and issues. Our Position Statement is informed by a range of international principles and standards including:

- 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
- ILO Conventions 138 (Minimum Age) and 182 (Worst Forms of Child Labour)
- UN Guiding Principles on Business and Human Rights
- UN Global Compact
- International Finance Corporation (IFC) Performance Standards
- Thun Group of Banks' "Guiding Principles: an interpretation for banks" (a discussion paper for banks on Principles 16-21 of the UN Guiding Principles on Business and Human Rights)

### Supplier Charter

Our Supplier Charter ([sc.com/suppliercharter](https://sc.com/suppliercharter)) sets out the principles for the behavioural standard that we expect from all our suppliers, and those within a supplier's sphere of influence that assist our suppliers in performing their obligations to us. All newly onboarded suppliers are expected to agree to the principles set out in our Supplier Charter. We seek to reinforce this through the terms of our contractual agreements, where possible. Our Supplier Charter is made available to all active suppliers on an annual basis.

### Speaking Up

To support a culture of strong ethics, trust, integrity and openness, Standard Chartered encourages employees, contractors, suppliers and members of the public to raise concerns through Speaking Up channels. These channels offer secure, confidential ways to report actual or potential misconduct without fear of retaliation. Third parties can make reports by using an independent third-party web-based channel (<https://secure.ethicspoint.eu/domain/media/en/gui/108379/index.html>).

The website accepts reports in a range of languages and these can be made anonymously. Reports will be handled by Standard Chartered in strict confidence. We communicate our Speaking Up programme to our suppliers through our Supplier Charter.

<sup>3</sup> The Standards define IFC clients' responsibilities for managing their environmental and social risks.

# How we approach managing modern slavery risk with clients

Due diligence is a central part of our approach in assessing and managing risks associated with the provision of financial services to our clients. We approach this due diligence in accordance with our Environmental and Social Risk Management (ESRM) and Financial Crime Compliance (FCC) frameworks.

## Environmental and Social Risk Management

We assess all applicable Corporate, Commercial and Institutional Banking (CCIB) clients against our Environmental and Social Risk requirements when providing credit limits, advisory services or debt capital market underwriting. Our Relationship Managers carry out an Environmental and Social Risk Assessment (ESRA) to identify risks of human rights infringements, including modern slavery and forced labour practices. We ask clients to provide evidence of policies and processes to identify and manage their worker and supply chain human rights risks and impacts, as well as their processes for managing community impacts and local grievances. The ESRA is reviewed and updated annually alongside the credit approval process.

We apply the Equator Principles (EP) when financing in-scope infrastructure and industrial projects (<https://equator-principles.com/about-the-equator-principles/>). The EP include a requirement to carry out a human rights impact assessment for projects with a higher risk of material environmental, social and human rights impacts.

Where we identify – or others bring to our attention – modern slavery-related allegations associated with our clients or transactions, the ESRM team will seek to understand what led to the allegation and, where needed, will engage directly with the client in connection with remediation of the issue and strengthening of modern slavery safeguards going forward. Where we cannot obtain sufficient comfort that appropriate safeguards are in place to prevent further infringements on human rights, we will seek to exit the client subject to contractual obligations.

Our relationship managers receive environmental and social risk management training to help them engage with clients on these issues. The trainings are delivered in-person and online. In 2023, 2,609 participants joined ESRM-related live training or e-learning sessions. Employees targeted for this training are those in client-facing roles and relevant support teams.

## Financial Crime Compliance

Our first-line defence against financial crime is not to provide services to parties that we know, or reasonably suspect are involved in organised or other crime, including modern slavery. Our customer due diligence procedures require us to understand the nature of a client's business activities and source of funds and/or wealth. We also conduct adverse media screening of our clients to identify potential connections to criminality, including modern slavery.

## ► Analysing modern slavery risks in select markets of our Consumer, Private and Business Banking (CPBB) segment

In 2023, we completed a strategic initiative to identify potential child sexual exploitation and modern slavery risks in two of our markets. The project analysed more than one million individual retail clients.

Results were shared with internal stakeholders and we published a paper with our consulting partner about the persona-based typologies used during this review (<https://www.redcompasslabs.com/persona-based-investigations-whitepaper>).

## How we approach managing modern slavery risk with clients continued

### The Whole Story

We continued the Group's award-winning, flagship financial crime learning event: The Whole Story 2023. This week-long interactive series of learning events were organised under the theme, Let's get #fightingfit, and focused on how staff can individually and collectively reboot and recharge the fight against financial crime and play a part in driving the right outcomes for clients, through the right conduct, culture, vigilance, and risk management. Events included sessions on countering child sexual exploitation, combatting adult trafficking and behavioural analytics for transaction monitoring.

### Enhancing our approach

Through internal and external engagement, we enhanced our approach in the following ways in 2023:

- **Review of our Human Rights Position Statement:** We commenced the review of our Human Rights Position Statement and intend to complete this review in 2024.
- **Review sector-specific Position Statements:** We reviewed our environmental and social requirements for sensitive sectors to better understand how clients manage labour and human rights impacts related to their operations, including identifying and assessing potential adverse human rights impacts and taking appropriate actions against the impacts.
- **Client assessments:** We continue to enhance our internal processes to identify, track and monitor allegations of human rights violations against clients. We reviewed the questions in our client ESRA that target human rights risks in 2023 and intend to apply enhancements to these questions in 2024.



# How we approach managing modern slavery risk with suppliers

Suppliers that are identified as presenting higher risks of modern slavery are subject to enhanced due diligence. We aim to increase our partnerships with diverse suppliers as well as with organisations that embrace diversity and inclusion to lift participation of smaller and minority-owned businesses within our supply chain.

## Supplier Charter

Standard Chartered will not knowingly enter into relationships with suppliers involved in human trafficking, modern slavery, or forced labour.

The Supplier Charter includes our expectations that suppliers:

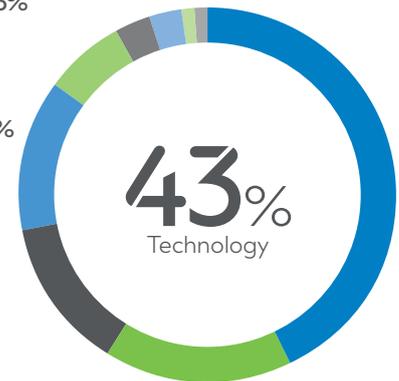
- Support and respect the protection of human rights in accordance with the UN Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights and ensure that they are not complicit in any human rights abuses.
- Take all reasonable steps to ensure that human trafficking, the use of all forms of forced or compulsory labour and any other form of modern slavery are not taking place in their supply chains or their own operations, recognising the role of ILO Conventions 29 and 105 on forced labour.
- Recognise and respect the rights of employees to associate freely and to organise and bargain collectively in accordance with the local laws of the countries in which they are employed, recognising the role of ILO Conventions 87 on freedom of association and 98 on the right to organise and collective bargaining.
- Do not use child labour, support the effective abolition of child labour and 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.

## Sourcing Profile

We spent around USD 4.5 billion in 2023 with over 11,500 active suppliers. We source from the majority of markets in which we operate. Most of our expenditure is indirect, focused on goods and services that enable our core provision of financial services, rather than goods for resale.

## Supplier Spend %

- Technology 43%
- Professional Services 16%
- Property 13%
- Marketing 13%
- Human Resources 7%
- Banking Operations 3%
- Travel 3%
- Office Supplies 1%
- Others 1%



## Risk Management

We conduct screening of all suppliers for money laundering, sanctions risk indicators and adverse media coverage. With the support of external and internal subject matter experts, we have identified category-country combinations that present higher risks of modern slavery. Suppliers that fall into those categories are subject to enhanced due diligence, the results of which inform our decision-making. Depending on geography, supplier categories with heightened modern slavery risk include office services and supplies, property, human resources, banking operations services, marketing, advertising services, technology hardware, telecoms and networks.

We seek to reinforce our human rights commitments through routine monitoring of suppliers where contractual arrangements with suppliers allow. Those found to be non-compliant with the principles in our Supplier Charter may face termination of contracts and be excluded from potential engagement opportunities.

Since 2020, the management of modern slavery risk within our supply chain has been included within the Reputational and Sustainability Risk Type Framework. We regularly review our controls and frameworks for identifying, assessing and managing modern slavery and related risks, such as health and safety, labour practices and fair wages.

## Enhancing our approach

Building on our actions in previous years, we took the following steps in 2023 in support of our aim to assess and manage the risk of modern slavery within our supply chain:

- **Risk assessment review:** We re-assessed the outstanding areas of work required to establish a comprehensive risk-based approach to environmental and social risk management for third parties. All active vendors, irrespective of their perceived modern slavery risk level, buying categories and geographical sources, are subject to adverse media screening, both during onboarding and periodically thereafter. Additionally, as part of our ongoing work to update the Human Rights Position Statement in 2024, we will also review our modern slavery risk control categorisation for suppliers.
- **On-site audits:** We resumed our on-site audit program for suppliers presenting higher risks of modern slavery. We had intended to do this in 2022 but were unable to because of ongoing COVID-19 restrictions.

# How we approach managing modern slavery risk with our workforce

We have policies and standards that set out how we engage with employees through hiring, during their career and upon leaving Standard Chartered. Our objective is for nobody in our workforce to be a victim of modern slavery through their employment.

Our workforce includes employees employed by Standard Chartered and non-employed workers (NEWs) who are contracted through third parties. We seek to address modern slavery risk in connection with NEWs through risk mitigation and monitoring measures taken with respect to our supply chain. Our Staff Screening Standard requires the review of identity documents which state date of birth to verify that new hires are of legal working age.

## Fair Pay

Our Fair Pay Charter sets out the principles by which we seek to deliver fair and competitive remuneration to all employees. We use those principles to guide reward and performance decision-making globally, including how we set, structure and deliver remuneration.

One of the commitments of our Fair Pay Charter is to pay a living wage in all our markets and seek to go beyond compliance with minimum wage requirements. Checks are conducted throughout our hiring and pay review processes. We are mindful that changes in economic conditions have increased the cost of goods and services. As a result, we have monitored changing conditions throughout the year to ensure that our pay remains appropriate, and where required, we provide monetary interventions as part of or outside of our annual pay review cycle. Further information on our alignment to the Fair Pay Charter can be found in our 2023 Diversity, Equality and Inclusion Impact Report.

## Grievances

We have a grievance process in place to enable employees to raise concerns relating to their employment or colleagues which affect them directly and cannot be resolved through informal mechanisms. This can include concerns relating to bullying, harassment, discrimination, and victimisation, as well as concerns regarding conditions of employment (for example, health and safety, new working practices or the working environment). We also have a disciplinary review process underpinned by fair accountability principles to address conduct and behaviour that fails to meet expected standards.



## Enhancing our approach

During 2023, we enhanced our approach in the following ways:

### • Fair pay and pay transparency:

In 2023 we refreshed our Fair Pay Charter to reiterate our commitment to fair pay and pay transparency. We published the refreshed Fair Pay Charter in our 2023 Diversity, Equality and Inclusion Impact Report.

### • Industrial Relations Strategy:

In 2023, we published an Industrial Relations (IR) Strategy to build on the IR principles that were introduced in 2022. The first IR principle is to “uphold the rights of all employees to freely associate and organise in a legitimate way”. This principle specifically supports the “Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)” principle of the ILO and helps address risk of modern slavery in our workplace.

# Supporting shared action

We are proud to engage with several leading non-governmental organisations (NGOs) and other civil society stakeholders that help to strengthen our understanding of the financial flows associated with modern slavery, for example helping to inform us of any geographic or sector specific characteristics or risks. To support our objective to fight financial crime ([sc.com/en/about/fighting-financial-crime/](https://www.sc.com/en/about/fighting-financial-crime/)) and manage environmental and social risks, we work with several groups to advance coordinated industry action against modern slavery. Examples of the initiatives and alliances that the Group participates are included in the table below.

Organisation	Basis for engaging	Progress in 2023
<b>Equator Principles (EP)</b>	<p>The EPs are intended to serve as a common baseline and a risk management framework – adopted by financial institutions – for determining, assessing and managing environmental and social risk in projects.</p> <p>As of 31 December 2023, 136 financial institutions in 38 countries were <a href="#">Equator Principles Financial Institutions (EPFIs)</a>. Standard Chartered has chaired the Equator Principles Association.</p>	<p>As a member since 2003, we continued to apply these principles to seek to ensure the projects we finance and advise on are developed in a manner that is socially responsible and reflects sound environmental management practices.</p> <p>Further, we continued to use these principles as a baseline for our own internal policies, procedures and standards for project due diligence.</p> <p>We also chaired the Equator Principles 2023 Annual Meeting in Washington DC.</p>
<b>The UK's Joint Money Laundering Intelligence Taskforce (JMLIT)</b>	<p>JMLIT is one of several financial crime-fighting and public/private information sharing partnerships in which we participate. JMLIT provides a framework for exchanging knowledge around key financial crime threats, including modern slavery. It helps us enhance our effectiveness in combating financial crimes by improving our understanding of their financial characteristics. It also helps us to play an active role in raising awareness among other financial institutions, law enforcement agencies and government bodies of the role that FIs can play in countering modern slavery.</p> <p>We chaired the JMLIT's Cell on modern slavery and Organised Immigration Crime (OIC) for four years between 2017-2021.</p>	<p>We continue to participate in the JMLIT's Cell on modern slavery and OIC and, as such, play a role in bringing together representatives from the public and private sectors to build and share knowledge, as well as help the financial industry take more effective action against modern slavery (<a href="https://www.sc.com/en/about/fighting-financial-crime/">sc.com/en/about/fighting-financial-crime/</a>).</p>
<b>Roundtable on Sustainable Palm Oil (RSPO)</b>	<p>Standard Chartered has been an active member of the RSPO for many years as we believe that environmental and social issues in the palm oil supply chain, including concerns relating to labour practices, require multi-stakeholder approaches.</p>	<p>We participated in the five-year review cycle of the 2018 RSPO Principles and Criteria and the 2019 RSPO Independent Smallholder Standard.</p> <p>As a member of the Standard Review Taskforce, we are advocating for, amongst other issues, measures to further strengthen workers' rights, promote fair pay and mitigate the risk of child exploitation.</p> <p>Based on the draft versions produced by the Standard Review Taskforce, the RSPO Secretariat intends to deliver a credible, relevant and impactful standard and certification system by the next RSPO General Assembly in November 2024, in close consultation with all stakeholders. Standard Chartered remains a member of the RSPO Board of Governors.</p>
<b>Thun Group of Banks (Thun Group)</b>	<p>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.</p>	<p>We continue to work with the Thun Group to develop human rights-related legal clauses. The objectives of this work also include guidance to improve banks' understanding of human rights.</p>

# Assessing effectiveness of our actions

Through the oversight arrangements detailed in the Governance section on page 2, we review the effectiveness of our actions to assess and manage modern slavery risks. We measure how we perform against our standard in a number of ways, including the metrics listed in the table below.

We will continue to review these metrics and will introduce new metrics if we find better ways to monitor our progress in assessing and managing the risk of modern slavery in our operations and supply chain.

Measure	2023	2022	2021
<b>Completion rate of our mandatory e-learning on anti-money laundering, which contains material on human trafficking</b>	99.9%	99.7%	99.6%
<b>Percentage of employees who have made an affirmed recommitment to the Code of Conduct and Ethics on an annual basis, and completed mandatory training or pre-assessment as required</b>	99.8%	99.5%	99.6%
<b>Number of clients and transactions reviewed by our dedicated ESRM team</b>	1,341 clients reviewed 708 transactions reviewed	1,170 clients reviewed 550 transactions reviewed	786 clients reviewed 547 transactions reviewed
<b>Number of participants in ESRM training sessions<sup>1</sup></b>	2,609 <sup>2</sup>	4,944 <sup>3</sup>	1,280

<sup>1</sup> Metric was updated in 2023 as all participants are counted for each live training or e-learning session. An employee may attend either or both types of training during the year.

<sup>2</sup> Includes 1,338 participants in live training sessions and 1,271 participants who completed e-learning sessions.

<sup>3</sup> Figure in 2022 was higher as the Group's mandatory Sustainable Finance Foundation training was launched in this year, incorporating ESRM as part of the curriculum. This training is mandatory for all CCIB Client Coverage team members.

We welcome feedback on our Modern Slavery Statement. Please contact us at [sustainability.feedback@sc.com](mailto:sustainability.feedback@sc.com).

This Statement was approved by the Board of Directors of Standard Chartered PLC on 16 February 2024 and is signed on behalf of the Board of Directors of Standard Chartered PLC and each of the Group's subsidiaries listed here.

The Board of Directors of the entities listed under "Scope of Statement" approved this Statement, and delegated authority to the Group Chief Executive Officer to sign on their behalf.



**Bill Winters**  
Group Chief Executive Officer

## Scope of Statement

This Statement covers Standard Chartered PLC.

Reporting entities under the UK Modern Slavery Act 2015:

Standard Chartered Bank  
Standard Chartered Holdings Limited  
Standard Chartered Bank Hong Kong Ltd

▶ Let us know  
what you think ◀

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