

MODERN SLAVERY ACT STATEMENT – NEDBANK GROUP LIMITED

This statement is published in terms of section 54(1) of the Modern Slavery Act 2015 (“Act”) and constitutes Nedbank Group Limited’s slavery and human trafficking statement for the financial year ending 31 December 2019.

This statement provides an overview of our business, and the steps taken by Nedbank Group Limited to ensure that slavery and human trafficking is not taking place in our supply chains and in our business as required in terms of the Act.

Our purpose and our business

Our purpose is to use financial expertise to do good for individuals, families, businesses and societies.

The Nedbank group is one of the largest financial services groups in Africa, offering wholesale and retail banking services as well as insurance, asset management and wealth management. In South Africa (SA) we have a strong franchise evidenced by a 19% deposit and 19% advances market share. Nedbank Group Limited is the holding company.

Outside SA we operate in five countries in the Southern Africa Development Community (SADC), through subsidiaries and banks in Lesotho, Mozambique, Namibia, eSwatini (Swaziland) and Zimbabwe (during 2019 we sold our operations in Malawi). In Central and West Africa, we have a strategic alliance with Ecobank Transnational Incorporated (ETI) and we have representative offices in Angola and Kenya.

Outside Africa we have a presence in key global financial centres to provide international financial services for Africa-based multinational and high-net-worth clients, in Guernsey, Isle of Man, Jersey and London, and we have a representative office in Dubai.

The Group Operating Model

A Group Operating Model (“GOM”) was approved by the Nedbank Group Board of directors on 26 October 2018.

The GOM governs the oversight exercised by Nedbank Group Limited over its subsidiaries and provides a framework for ensuring that the entire group has adequate processes, procedures, systems and controls to enable Nedbank Group Limited and its subsidiaries to comply with legal and regulatory obligations.

The Governance of Human Rights in our Supply Chain and in our Business

The groups’ Human Rights in Business Policy confirms the group’s commitment to uphold human rights in business, the protection of human rights as enshrined in the SA Constitution and Bill of Rights, and the protection of children against forced labour, modern slavery and child labour. This is further emphasised in the group’s Children’s Rights Pledge of Human Rights in Business, and the group’s Conflict Minerals Statement.

The Nedbank Group Human Rights in Business Statement provides guidance to employees on their responsibilities regarding human rights and to serve as confirmation to stakeholders that the group manages its human rights impact, risks and opportunities effectively. The Nedbank Group Human Rights in Business Statement confirms the group’s commitment to protect the human rights of its employees which is strongly reflected in the group’s employment policies as well as the Nedbank Code of Ethics and Conduct.

The Nedbank Code of Ethics and Conduct was updated to incorporate learnings from recent corporate scandals in 2018 and further reviewed and updated in 2019/2020. Staff are required to acknowledge this Code, and the Nedbank Group Ethics Office provides training and guidance to staff on an ongoing basis in terms of its application and interpretation.

The Nedbank Code of Ethics and Conduct confirms the group’s commitment to aligning operations and strategies with the 10 principles that underpin the United Nations Global Compact of which the group is

a signatory. We submit an annual Communication of Progress to the UNGC in support of our commitment to these 10 principles which are as follows:

- Human Rights
 - Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
 - Principle 2: Make sure that they are not complicit in human rights abuses.
- Labour
 - Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
 - Principle 4: The elimination of all forms of forced and compulsory labour;
 - Principle 5: The effective abolition of child labour; and
 - Principle 6: The elimination of discrimination in respect of employment and occupation.
- Environment
 - Principle 7: Businesses should support a precautionary approach to environmental challenges;
 - Principle 8: Undertake initiatives to promote greater environmental responsibility; and
 - Principle 9: Encourage the development and diffusion of environmentally friendly technologies.
- Anti-Corruption
 - Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

The Nedbank Procurement Policy was reviewed and updated in 2018 and thereafter 2019. The Procurement Policy emphasises supplier due diligence as one of the key principles of our procurement transactions.

The Nedbank Supplier Code of Conduct was reviewed and updated in 2018 into a Supplier Code of Ethics and Conduct. Suppliers are required to acknowledge this Code as part of the supplier on-boarding process and to comply with same. Included in the Code is a requirement of our suppliers to conduct their business activities and employment practices in compliance with applicable laws, rules and regulations, including immigration and employment laws in respect of their employees. The Code makes it clear that the group does not condone supplier use of child labour, forced labour, and labour that is considered to be modern slavery.

As part of the supplier on-boarding process, specific questions related to human rights in business are included in Supplier Profile Questionnaires to establish the level of implementation of human rights in business in supplier operations. In addition, training is made available to suppliers regarding the implementation of human rights in business.

In respect of clients:

- Transactional monitoring and adverse media monitoring are existing controls that assist in identifying whether clients are involved in any unethical or illicit activities (which include but are not be limited to financial crime, modern slavery and human trafficking).
- Nedbank conducts specific environmental impact assessments (as part of our Social and Environmental Management System) prior to advancing finance to clients in high-risk industries. The industries include the following: mining, construction, chemical and oil, manufacturing, property development, agriculture, waste management and fuel service stations. Our Social and Environmental Management System assessments include human rights related questions around child labour, forced labour, and compliance with labour legislation.

The group encourages its internal and external stakeholders to report any unethical behaviour and in this regard; provides stakeholders with a range of three channels for the reporting of such behaviour, including an Anonymous Tip-Off channel.

The group's commitment to several sustainability initiatives, along with a deliberate focus on the Sustainable Development Goals (SGD) forms an important part of our overall strategy as we align our business to deliver on our purpose - to use financial expertise to do good for individuals, families, businesses and societies.

This statement will be reviewed annually and has been approved by the Nedbank Group Limited Board of Directors on 21 May 2020 and signed by the CEO.

A handwritten signature in black ink, appearing to read 'MWT Brown', is written over a solid horizontal line.

MWT Brown