



Barclays Group Statement on Human Rights

20 February 2024

Introduction

This Statement sets out the Barclays Group commitment and approach to respecting human rights – in our roles as an employer, a provider of financial products and services, and a procurer of goods and services. This is aligned with our Purpose.

The commitments set out in this Statement are supported by an evolving framework of policies and processes that seek to embed these commitments across our business. This includes setting Barclays' expectations of those with whom we engage: our colleagues, customers, clients and third-party service providers ("TPSP")¹.

Barclays is on a journey to enhance and further embed our approach to respecting human rights. In 2023 we completed our salient human rights risk assessment for our Corporate and Investment Bank ("CIB"), identifying the most severe human rights impacts that could be associated with our CIB financing portfolio. We have prioritised this area for review based on the relative potential risks to people. Over time we plan to extend our saliency assessments beyond CIB to cover other aspects of Barclays' business, operations, and value chain.

Our [Human Rights Focus Areas for Progress](#) sets out the actions we are taking to further implement the commitments in our Statement and make progress guided by the salient issues identified in our assessment. We plan to report annually on our progress against the Focus Areas for Progress.

Barclays' commitment and approach to respecting human rights

Barclays is committed to respecting human rights as defined in the International Bill of Human Rights² and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work (ILO **Declaration**). Our approach to respecting human rights is guided by the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD Guidelines).

We endeavour to monitor emerging human-rights-related laws, rules and regulations, as well as international normative standards, good practice and stakeholder expectations – and we seek to review our policies and practices accordingly.

Scope and coverage

This Statement applies to all Barclays Group colleagues and sets our expectations for Barclays Group clients and TPSP. This Statement sets out our approach to assessing and managing our relationships with these parties.

Where local legislation is more stringent, local requirements will apply in addition to this Statement. Where it conflicts with Barclays' commitments set out in this Statement, we will comply with the law and, where relevant, will seek to raise awareness of human rights and make efforts to engage with relevant stakeholders to seek to ensure human rights are respected.

¹ Under the [Barclays Third Party Code of Conduct](#), a TPSP means any entity that has entered into an arrangement with Barclays in order to provide business functions, activities, goods and/or services.

² Comprising the Universal Declaration of Human Rights (UDHR), the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights.

Our approach to human rights

We take steps to respect human rights in our own operations through our employment policies and practices, in our supply chain through screening and engagement, and through the responsible provision of our products and services. We offer a wide range of products and services to a broad spectrum of customers and clients in different regions and sectors, and our approach to human rights is tailored accordingly.

Where we identify that Barclays may be connected to adverse impacts on human rights, we will take steps to understand the nature of our involvement and consider an appropriate response – including, in certain cases, the possibility of exiting the relationship.

An overview of the evolving framework of policies and processes that seek to embed our commitments across our business is provided below. This framework should be considered in conjunction with relevant Barclays policies and standards on, amongst others, financial crime, physical security, customer protection, and data privacy and security.

In our role as an employer

- Our people and our culture are our greatest assets. Our objective is to make Barclays a great place to work, enabling colleagues to deliver the best results for our customers, clients, and communities.
- Our code of conduct – the Barclays Way – outlines the Purpose, Values and Mindset that govern our way of working across our business. It is a reference point covering all aspects of colleagues' working relationships and provides guidance on working with colleagues, customers and clients, governments and regulators, business partners, suppliers, competitors and the broader community. The behavioural standard set by the Barclays Way applies to every Barclays colleague, in every country, and all colleagues are required to undertake associated training.
- The Barclays Way sits alongside our internal employment policies and practices, which cover a range of issues including diversity, equity and inclusion, disciplinary process, raising a grievance, bullying and harassment, hiring and onboarding, learning and development, fair pay, reward and performance, health and safety, raising concerns and whistleblowing. While not identified expressly as human rights policies, the actions we take pursuant to these policies are an important part of our efforts to meet our responsibility to respect human rights, including workers' rights.
- We recognise colleagues' right to freedom of association and encourage them to speak up about actions and behaviours that have no place in our organisation. We monitor the effectiveness of our employment policies and practices through a variety of means, including employee engagement, satisfaction surveys, direct feedback from colleague representatives via recognised trade unions, staff associations and works councils, tracking of raised concerns, and performance reviews where a strong focus is placed on adherence to Barclays' Values.

In our role as a provider of UK retail banking services

- We aim to offer an accessible, responsive and inclusive service for our customers – including for those who may typically face barriers to accessing banking services, such as those living with disabilities or complex needs, or who are experiencing difficult life events.
- From time to time we partner with third parties to support customers experiencing economic abuse – where an abuser may restrict how someone accesses their money – and coerced debt – where someone

may be forced to take on borrowing – to give them the required assistance. Where relevant we connect them to dedicated colleagues in Barclays for support with their banking.

- Where there is no longer enough demand to support a branch, we support access to banking by maintaining an in-person presence through our Barclays Local network – live in over 300 locations, based in libraries, town halls, mobile vans and our banking pods. In addition, Barclays is a member of Cash Access UK, ensuring sustainable cash access provision across the UK – including operating shared banking hubs where customers can access counter services and receive face-to-face support from a Barclays colleague.
- As part of our work to identify and report suspicious activities within our retail and business banking customer base, we use a variety of controls to detect modern slavery and human trafficking risks.

In our role as provider of private banking discretionary management services³

- Barclays Private Bank's investment due diligence, within Discretionary Portfolio Management, aims to consider material and/or relevant risks of portfolio companies – including on human rights risks, such as modern slavery, human trafficking, forced labour, workplace standards and employee relations.
- We use the International Bill of Human Rights, the UNGPs, OECD Guidelines and the 10 principles of the UN Global Compact as guiding reference frameworks to understand the responsibility of portfolio companies with respect to human rights – and to consider material and/or relevant risks of portfolio companies on human rights. These standards also support the evaluation of other related controversies against the entity, as identified by our third-party data provider.
- Through our stewardship partner, we seek to engage, as appropriate, with portfolio companies associated with actual and potential human rights impacts – and seek opportunities for the company in question to take action to mitigate or cease their impacts.

In our role as provider of CIB services

- As part of our various pre-screening processes we identify clients in scope of our position statements. All in-scope clients must be assessed annually via a detailed Sustainability enhanced due diligence questionnaire which is used to evaluate their performance on a range of environmental and social issues – including human rights – and may be supplemented by a review of client policies and procedures, further client engagement and adverse media checks, as appropriate.
- This annual review either generates an Environmental and Social Impact (ESI) risk rating (low, medium, high) or, in the case of Defence and Security, an assessment against risk appetite which in turn determines whether further review and client engagement may be required throughout the year. Where client relationships or transactions are assessed as higher-risk (high or medium ESI risk rating) or outside appetite (in the case of Defence and Security) following a Sustainability enhanced due diligence review, they are then considered for escalation to the appropriate business unit review committee – such as the

³ This refers to our role as manager of discretionary investment portfolios for clients of Barclays Private Bank only.

Transaction Review Committee – for consideration and a decision on whether to proceed, if transaction related.

- In 2023 we completed a saliency assessment of human rights impacts linked to the CIB financing portfolio, including consideration of impacts on workers, communities and consumers in our clients’ operations and value chains. The salient human rights issues identified will guide the enhancement of our relevant policies and human rights due diligence processes in this area.

In our role as a procurer of products and services

- Barclays’ standard Third Party Service Provider (TPSP) terms include an obligation on the TPSPs to respect internationally recognised human rights – including not using forced, bonded or involuntary prison labour or engaging in any practices constituting modern slavery or human trafficking. The terms also require Barclays’ TPSPs to use reasonable efforts to procure the same of their affiliates and subcontractors.
- Barclays’ standard approach to new TPSP onboarding and renewal begins by assessing the services provided and ascertaining the level of exposure to certain risks – such as that of breaching data privacy and health and safety rights within the TPSP’s business operations. The consideration of risks (which relate to human rights topics) is an important part of our efforts to meet our responsibility to respect human rights.
- TPSPs assessed as being above a low risk of exposure from a business risk perspective – both at the point of onboarding and on an ongoing basis – become ‘managed’ TPSPs. Managed TPSPs are subject to Barclays’ Supplier Control Obligations and are asked to complete an annual self-attestation against topics contained within our Third Party Code of Conduct (TPSP CoC).
- The TPSP CoC identifies our expectations regarding respecting human rights through areas such as occupational health and safety, freely chosen employment, avoidance of child labour and practices that could lead to exploitation of workers, freedom of religion and belief in the workplace, freedom of association and collective bargaining, zero tolerance for discrimination, harassment and abuse, accessible grievance and whistleblowing mechanisms. During the annual self-attestation process TPSPs are asked questions related to these TPSP CoC topics. Those whose responses do not meet our expectations are escalated to risk owners for appropriate action and remediation.

In our communities

- Barclays believes that a strong, inclusive economy is a better economy for everyone. Through our global programmes we are supporting communities by enabling people to develop the skills and confidence they need to succeed, while helping businesses grow and create jobs.
- Barclays works with experienced partners, employability specialists and hiring businesses to develop meaningful and innovative programmes that deliver a positive impact by enhancing the skills and employability of people in our communities.
- Further detail on how we support our communities is available [here](#).

Remedy

We encourage colleagues to speak up and raise concerns directly to their management or colleagues in Compliance, HR or Legal. If colleagues prefer, they can also contact the Raising Concerns team – who will assess the concerns raised and refer them to the most pertinent team for review and, where appropriate, investigation.

The Raising Concerns channel is also available via Barclays' external facing webpage [here](#).

Our Focus Areas for Progress include reviewing our approach to remedy, including assessing our engagement with clients and TPSP.

Ongoing monitoring and tracking

We also seek to monitor issues and developments globally that may present new or elevated human rights risks, and work to evaluate our potential involvement and consider our responsibilities to seek to address these risks.

In time we aim to develop appropriate indicators against which to monitor the effectiveness of our approach to managing human rights risks across Barclays Group.

Governance

This Statement has been approved by the Board of Barclays PLC, the most senior governance body in the Barclays Group.

The Barclays PLC Board receives regular updates on public policy and corporate responsibility matters, including ESG and Reputation risk, which may cover human rights matters.

The Board is presented with the Group Reputation Risk Report from the Group Head of Public Policy and Corporate Responsibility twice a year in order to consider the most significant live and emerging reputation risks for the Group, as well as a summary of items discussed by the Group Reputation Risk Committee from the Group Chief Compliance Officer. Both of these updates may cover human rights matters. In addition, the Board may be notified of, or asked to consider, specific Reputation risk matters from across the Group, aligned with the escalation protocols set out in the Reputation Risk Management Framework.

The Board is supported by the Board Sustainability Committee, which provides oversight of climate matters and the sustainability agenda, including human rights matters, escalating items to the Board as appropriate. The Board Sustainability Committee is assisted by the Barclays Group Sustainability Committee, which is chaired by the Group Head of Public Policy and Corporate Responsibility, in discharging its responsibilities.

Communication

We provide information about our approach to human rights and our progress in our Annual Report and our Modern Slavery Statement.

We will review our Focus Areas for Progress and our Statement as needed, so that they remain relevant and aligned with our Purpose.