

# Barclays Group Statement on Modern Slavery

February 2021



## Introduction

As one of the world’s largest financial services institutions, we believe we are at our most effective when we deploy finance to support people and businesses in a way that is responsible, transparent and makes a real and lasting difference to the lives of those we serve, our colleagues, and the communities in which we live and work.

We understand that the nature of our business means we may be exposed to modern slavery risks across our operations, supply chain, and customer and client relationships. We do not tolerate modern slavery, human trafficking or forced labour and are committed to identifying and addressing these risks across our value chain. In this Statement<sup>1</sup> we will report the progress we have made over the course of the year, and our plans for the year ahead. Further information on our broader approach to managing environmental and social risks can be found in our [Environmental, Social and Governance Report 2020](#).

## Our Business and Supply Chain

### Our Business

Barclays is a British universal bank. We bank consumers and small businesses through our retail banking services, and larger businesses, institutions and governments through our Corporate and Investment Bank.

### Our Purpose

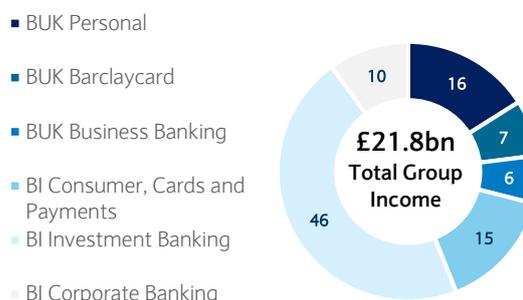
We deploy finance responsibly to support people and businesses, acting with empathy and integrity, championing innovation and sustainability, for the common good and the long term.

### What We Do:

Move	Lend	Connect	Protect	Invest and Advise
We facilitate transactions and move money around the world	We lend to customers and clients to support their needs	We connect companies seeking funding with the financial markets	We ensure the assets of our clients and customers are safe	We help our customers and clients invest assets to drive growth
<ul style="list-style-type: none"> <li>• Payments</li> <li>• Foreign exchange</li> </ul>	<ul style="list-style-type: none"> <li>• Term lending</li> <li>• Credit cards</li> <li>• Overdrafts</li> <li>• Trade and working capital</li> </ul>	<ul style="list-style-type: none"> <li>• Equity capital markets</li> <li>• Debt capital markets</li> </ul>	<ul style="list-style-type: none"> <li>• Deposit accounts</li> <li>• Risk management</li> </ul>	<ul style="list-style-type: none"> <li>• Investments</li> <li>• Trading</li> <li>• M&amp;A</li> </ul>

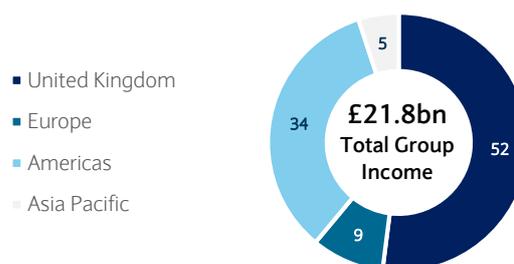
<sup>1</sup> This statement is a joint statement made according to the requirements of section 54 of the Modern Slavery Act 2015 or the Australian Commonwealth Modern Slavery Act 2018 for the financial year ending 31 December 2020. This is our fifth UK Statement and first Australian Statement. This statement applies to all companies within the Barclays group that are required to produce a statement as listed in the Appendix.

### Group Income by Business (%)



Percentages exclude Head Office which was a negative income of £0.5bn

### Group Income by Region (%)



Our income generation demonstrates the range of retail and commercial products and services we offer.

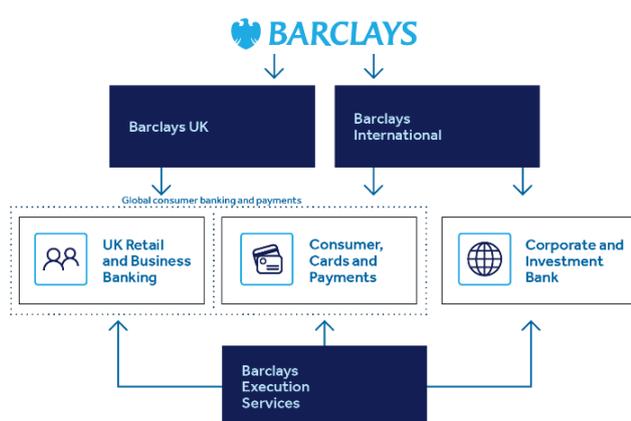
## Our Company Structure

Barclays operates as two divisions, Barclays UK and Barclays International, supported by our service company, Barclays Execution Services – or BX as we call it. Our ultimate parent company, Barclays PLC, is incorporated in England and listed on the London Stock Exchange.

Barclays UK (BUK) consists of our UK Personal Banking, UK Business Banking and Barclaycard Consumer UK businesses. These businesses are carried on by our UK ring-fenced bank (Barclays Bank UK PLC) and certain other entities within the Group.

Barclays International (BI) consists of our Corporate and Investment Bank and Consumer, Cards and Payments businesses. These businesses are carried on by our non ring-fenced bank (Barclays Bank PLC) and its subsidiaries, as well as by certain other entities within the Group.

Barclays Execution Services (BX) is the Group-wide service company providing technology, operations and functional services to businesses across the Group. Further details of our subsidiaries and the countries in which they are incorporated, as well as our businesses, are set out in our [2020 Annual Report](#).



Barclays adopts a group-wide approach to addressing modern slavery risks in its operations and supply chain, which includes the adoption of relevant group-level policies and due diligence procedures. There are several subsidiary companies of Barclays PLC that meet the threshold of “reporting entities” required to have a modern slavery statement under the UK Modern Slavery Act 2015 or the Australian Commonwealth Modern Slavery Act 2018, which are listed in the Appendix. This Statement is a joint statement made by Barclays PLC on behalf of itself and those reporting entities.

For the first time this year we are required to report on Barclays Bank PLC and our Asia Pacific subsidiary Barclays Capital Asia Ltd in compliance with the Australian Commonwealth Modern Slavery Act 2018.

Barclays Bank PLC is the non ring-fenced bank within the Barclays Group. The Barclays Bank Group contains the majority of the Barclays Group’s Barclays International division. Barclays International consists of our Corporate and Investment Bank and Consumer, Cards and Payments businesses, including our Private Bank which provides a range of personal and institutional wealth management products and services, including investments, credit and cash management solutions. These businesses are carried on by our non ring-fenced bank (Barclays Bank PLC) and its subsidiaries, as well as by certain other entities within the Group. Barclays Bank PLC has a physical presence in 31 countries<sup>2</sup>, with its registered office in London, UK. Barclays Bank PLC currently engages in limited wholesale activities in Australia with its foreign company registration and licensing exemption granted by the Australian Securities and Investment Commission (ASIC). It is in the process of seeking an ADI (Authorised Deposit-taking Institution) licence with the Australian Prudential Regulation Authority (APRA). As of 31 December, Barclays Bank PLC employs ca. 2000 staff across the Asia Pacific region. Barclays Bank PLC only deals with wholesale based, corporate clients in the Asia Pacific region (including Australia) mainly providing corporate and investment banking services, markets and research products. Its supply chains and vendor relationships are centrally managed by the group procurement function based in the UK. The Board of Barclays Bank PLC has reviewed and approved this statement.

Barclays Capital Asia Ltd is incorporated in Hong Kong and provides various financial services including securities advisory and trading services under its licence by the Securities and Futures Commission (SFC) of Hong Kong. It also engages in limited wholesale activities in Australia with its foreign company registration and licensing exemption granted by the Australian Securities and Investments Commission (ASIC). As of 31 December, Barclays Capital Asia Ltd employs around 423 permanent staff in Hong Kong and approximately 10 in Australia. Barclays Capital Asia Ltd only deals with wholesale based, corporate clients in both Hong Kong and Australia. Its supply chains and vendor relationships are centrally managed by the group procurement function based in the UK. The local management of Barclays Capital Asia Ltd in Hong Kong and Australia was consulted by Barclays Group Sustainability team in the preparation of this Statement.

<sup>2</sup> Barclays Bank PLC has a physical presence in the following countries: Argentina, Brazil, Canada, Cayman Islands, China, Germany, Guernsey, Hong Kong, India, Ireland, Isle of Man, Japan, Jersey, Korea, Luxembourg, Malta, Mauritius, Mexico, Monaco, Netherlands, Philippines, Portugal, Saudi Arabia, Singapore, South Africa, Spain, Sweden, Switzerland, UK, US, Zimbabwe.

## Our People

As of 31 December 2020, we have 83,000 permanent employees operating primarily in the UK, the US and the Asia Pacific region. 99% of Barclays employees are employed directly by Barclays, on Barclays payroll and on a Barclays contract, and 1% are temporary staff paid through a third party for a defined term.

### Number of Colleagues by Region (000's)



Barclays is committed to paying the Living Wage and has been an accredited UK Living Wage employer since 2013, ensuring that all UK employees and those who provide services at our sites are paid at least the current National Living Wage and the London Living Wage in London, as set by the Living Wage Foundation. In 2019 we expanded our commitment by implementing a minimum hourly rate of \$15 in the US, which will now increase to \$17 in 2021. We have continued our work with the Fair Wage Network, using their benchmarks as part of our annual salary review process in all locations where data is available (for more than 98% of colleagues globally, including in Hong Kong where we pay above the benchmarks provided by the Fair Wage Network). For further information, see our [Fair Pay Report 2020](#).

## Our Supply Chain

Though our businesses are geographically diverse, nearly 90% of our third-party spend is concentrated in the UK and US, our two home markets. Our supply base is diverse across scale, ownership-type and structure – from privately-held start-ups to publicly listed multinational corporations.

Those with whom we contract directly, also known as first-tier suppliers, generally fall into one or more of the following categories: Corporate Real Estate and related services, Technology Infrastructure, Software & Services, Banking Operations, Professional Services, Marketing and Human Resources. With many of our suppliers having their own extensive supply chains, we connect to thousands more businesses and employees worldwide, including use of diverse suppliers as second-tier suppliers (subcontractors).

## Assessing and Addressing Modern Slavery Risks

### Our Policies on Modern Slavery and Human Trafficking

As a responsible corporation we are committed to operating in accordance with the International Bill of Human Rights (comprising the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights). We take into account the UN Guiding Principles on Business and Human Rights and other internationally accepted human rights standards including the OECD Guidelines for Multinational Enterprises and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and other Core Conventions. We are also a founding member and signatory to the UN Principles for Responsible Banking.

We embed our commitment into relevant policies and statements, which are instrumental in managing our approach to modern slavery risk and which have been amended to take account of the UK Modern Slavery Act, including:

- Our Code of Conduct “[The Barclays Way](#)”, which defines the behaviors, standards and actions required from all employees. The Barclays Way reiterates Barclays commitment to operating in accordance to the Universal Declaration of Human Rights.
- Our [Group Statement on Human Rights](#), which outlines our commitment to respecting human rights across our business operations, supply chain activities, interactions with local communities, and provision of products and services for clients and customers.
- Our people policies are designed to provide equal opportunities and create an inclusive culture, in line with our values and in support of our long-term success. They also reflect relevant employment law, including the provisions of the Universal Declaration of Human Rights and ILO Declaration on Fundamental Principles and Rights at Work.
- Our [Statement of Anti-Money Laundering \(AML\)](#) sets out the minimum control requirements designed to ensure that all Barclays businesses and legal entities comply with the requirements and obligations set out in relevant legislation, regulations, rules and industry guidance for the financial services sector. This includes the

requirement to have adequate systems and controls in place to mitigate the risk of the firm being used to facilitate financial crime. This statement is relevant because modern slavery offences are often linked to money laundering and other financial crimes.

- Our [Supplier Code of Conduct](#), which outlines the standards that we expect our suppliers to adhere to, including on human rights and modern slavery-related issues.

### Reporting Concerns

It is important that Barclays maintains a culture where anyone feels they can speak up if they believe that something is not right. Barclays is pleased that a significant majority of our employees feel it is safe to do so. Most people feel comfortable raising concerns directly to their management, Compliance, Legal and HR. However, where individuals do not feel comfortable using these channels they can contact the Barclays Raising Concerns Team. The Raising Concerns Team receive, assess, and refer concerns (including whistleblowing concerns) to the most appropriate team for review and possible investigation. All matters raised through the Raising Concerns process are treated seriously and all concerns are managed sensitively and confidentially.

Whistleblowing is a core element of raising concerns at Barclays. Whistleblowing relates to concerns which fall into the wider public interest, such as a breach of our policies and procedures; breaches of law and regulation; and, behaviour that harms or is likely to harm the reputation or financial well-being of Barclays. We take all whistleblowing reports extremely seriously and no one should experience any form of overt or covert retaliation.

During 2020:

- 0 substantiated incidents related to modern slavery or human trafficking concerns were raised through our Raising Concerns reporting channels.

### Governance

During 2019 the Board assumed direct oversight of culture, environmental and reputation matters from the Board Reputation Committee (which was disbanded September 2019). The Board receives periodic updates from management on ESG related matters.

At an operational level, we have a cross-functional modern slavery working group to effectively coordinate our anti-modern slavery activities and reporting, as well as share knowledge on the topic. The working group includes stakeholders from across the business, including representatives from our legal, financial crime, procurement, reputation risk and sustainability functions.

## Risk Assessment and Due Diligence

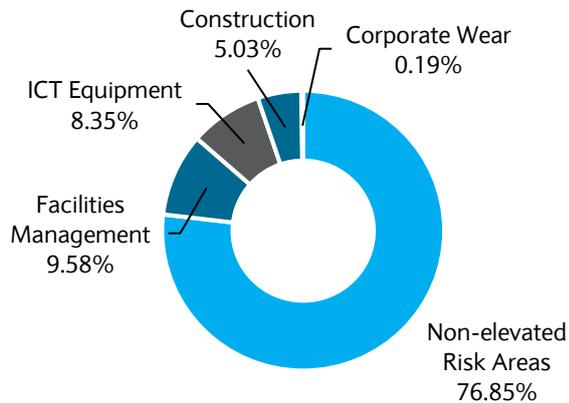
### Suppliers

Barclays is committed to understanding and addressing the modern slavery risks that we may be linked to through our supplier relationships. We assess our supply chain for modern slavery risks, considering factors such as country risk, sector & category risk, spend, and likelihood of modern slavery, utilising data and analysis from expert organisations such as the International Labour Organisation, Global Slavery Index and Maplecroft to inform this. Through this risk assessment we have identified the following areas as presenting an elevated risk of modern slavery in our supply chain, which are designated as priority focus areas for our future supply chain due diligence:

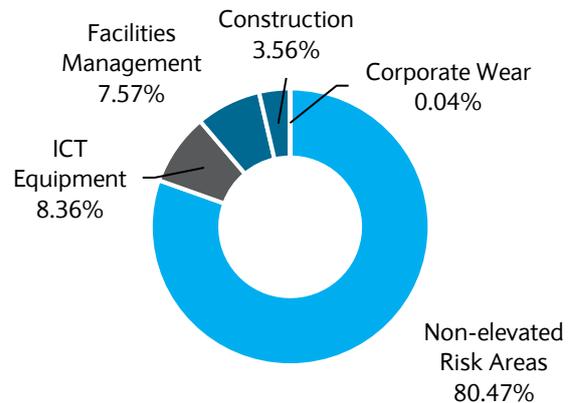
- Facilities management services provided on our properties, including cleaning and catering.
- Construction of our properties, and related construction services.
- Manufacture of ICT equipment used in our offices and retail branches.
- Manufacture of corporate uniforms and other branded items used by our staff.

These areas share common risks factors that we have identified through the risk assessment; (i) the goods may be sourced from, or services provided in, certain countries with a higher estimated prevalence of modern slavery, and (ii) a higher likelihood that unskilled, low skilled or vulnerable groups are involved in supplying these goods or services.

## Number of Suppliers per Elevated Risk Area (%)



## Supplier Spend per Elevated Risk Area (%)



We have a robust process that aims to ensure we only work with appropriate suppliers who can meet the standards that we expect. Our contracts require all suppliers to comply with all applicable laws and regulations and in addition, we require higher risk categories of suppliers to operate in accordance with our [Supplier Code of Conduct](#).<sup>3</sup> This outlines how we manage human rights in our supply chain by encouraging behaviours and practices consistent with our own policies and is owned by Barclays Chief Procurement Officer.

Our Supplier Code of Conduct makes specific reference to the International Labour Organisation Core Conventions and the UK Modern Slavery Act 2015. Of particular relevance is the requirement for suppliers to support freely chosen employment: *work that is completed voluntarily and without slavery, servitude, forced or compulsory labour and human trafficking*. When contracting with suppliers, regardless of the industry or geography in which the supplier operates, these obligations must be included in any downstream contracts. Our usual practice is to notify potential suppliers about this as part of our requirements before they submit a commercial bid.

Before entering into a relationship with a higher risk category supplier, Barclays will conduct appropriate due diligence with the aim of addressing and mitigating modern slavery risk. This may include, but is not limited to, reviewing copies of employment and health and safety policies and undertaking due diligence with the aim of establishing that the supplier does not have any association with modern slavery

and that they have not been engaged in any activity with an adverse human rights impact.

Barclays' standard approach begins by assessing the services that are being provided and ascertaining the level of risk. All suppliers (with the exception of those assessed as low risk) must complete an annual self-certification against our Supplier Code of Conduct. Higher risk suppliers are also subject to periodic assurance activities where a specialist team reviews evidence that the supplier is continuously meeting the requirements agreed to contractually, and which may also include a review of how suppliers adhere to our supplier code of conduct.

If suppliers provide services that meet our definition of health and safety, which covers modern slavery focus areas such as facilities management, catering and construction, additional due diligence is undertaken using the SEDEX platform. Any concerns identified through SEDEX are investigated, discussed with the supplier and additional action determined which could include choosing to exit the supplier. Barclays define health and safety as;

- Suppliers who undertake physical tasks/activities on Barclays' premises, which has the potential to cause, harm either to themselves and/or to others
- Suppliers where Barclays' employees will attend the supplier premises to access the services which have the potential to cause harm to either themselves or others
- Any suppliers involved in construction or installation related activities

<sup>3</sup> **Note:** we do have relationships with financial institutions and market counterparties which, because of the nature of the services being provided (such as international account holding services), are not subject to our usual supplier on-boarding procedures and which are therefore not subject to the Supplier Code of Conduct. In this instance, we are also aware suppliers tend to have their own code of conduct, which they follow.

Barclays manages its supplier relationships on a centralised basis from its UK Group Procurement function. Suppliers servicing Barclays Bank PLC and Barclays Capital Asia Ltd are therefore covered by this process.

During 2020, we:

- Continued to develop our code of conduct and our approach for monitoring our Tier 1 supply chain for modern slavery risks.
- Refreshed our supply chain modern slavery risk assessment and updated our priority supply chain

focus areas, considering both sector and country risk based on data from external sources such as the International Labour Organisation, Global Slavery Index and Maplecroft.

- Worked with our suppliers to move on site due diligence reviews to desk based due diligence reviews as a result of the Covid-19 pandemic. This change in approach has enabled us to retain our robust control environment.

#### During 2021, we aim to:

- Launch a new major initiative which will be a project focussed on supply chain sustainability with the aim of reviewing and improving our current processes, procedures and standards in relation to social risks, including modern day slavery, and environmental management and supplier diversity. The remit of the program includes the entire supplier life cycle of supplier

selection, pre contract due diligence, post contract supplier management and ongoing supplier assurance.

- Adopt a new support tool called RADAR on the SEDEX platform for suppliers we define as falling into our health and safety definition. This tool will give us the ability to benchmark suppliers who are providing similar services in the same geographies to help us select the most appropriate suppliers.

#### Retail Customers

Criminals involved in modern slavery may use the products and services provided by our retail bank to facilitate their criminal activities, as well as launder the proceeds of these activities. Barclays recognises the important role it can play in combatting modern slavery through its approach to tackling financial crime, and has a number of established controls in place to monitor suspicious behaviours and financial activity linked to modern slavery. Through this work, Barclays is able to identify relationships where behaviours and account activities indicate possible connections to modern slavery. We have an escalation process, whereby suspicious activity reports are raised and details are passed on to law enforcement agencies. This work alerts these partners to suspected victims and perpetrators of modern slavery offences, and enhances our understanding of emerging trends and indicators.

In addition to these controls Barclays works in collaboration with key public and private sector

partners to implement effective detection, disruption and prevention strategies that protect our customers, the wider community and Barclays against exploitation.

During 2020, we:

- Began implementing a new technology solution to enhance our ability to proactively detect and investigate modern slavery indicators amongst retail customers. This technology has the ability to identify trends across significant datasets and will improve our ability to detect and address modern slavery risks.
- Observed a decrease in the number of modern slavery incidents identified across our branches, which may be partly due to the Covid-19 pandemic and/or related travel restrictions, which inhibited the potential movement of overseas workers in the UK.

#### During 2021, we aim to:

- Continue to work with key external partners to identify potential changes to the risk landscape as a result of the Covid-19 pandemic and other significant events such as Brexit.

- Continue to develop our modern slavery prevention strategy to enhance detection of key modern slavery risk indicators.
- Enhance the use of technology to improve our ability to detect and investigate modern slavery indicators.

## Corporate Clients

Management of social risks associated with clients, including human rights and modern slavery risks, are governed as part of Barclays' reputation risk management framework and processes, which cover both Barclays Capital Asia Ltd and Barclays Bank PLC client relationships. We have general client due diligence processes in place which can identify the risk of clients being associated with modern slavery and human trafficking by front office banking and KYC teams during client onboarding and relationship reviews. Where cases are identified that present cause for concern from a human rights or modern slavery perspective, these are referred for further investigation to the Group Sustainability and/or Financial Crime teams depending on the nature of the concern.

We have also established position statements covering our relationships with clients in sensitive sectors that may present significant adverse impacts on people or the environment. These statements detail our expectations for clients and require them to comply with applicable international standards and legislation and show a clear commitment to robust environmental and social risk management.

In sectors where modern slavery is a salient issue, we include specific requirements relating to this area. For

example, our Forestry and Agricultural Commodities Statement includes provisions around the prohibition of forced and child labour, modern slavery and human trafficking for companies involved in downstream forestry and palm oil production activities, as these are widely recognised as salient risks in certain countries. We also require that these companies achieve certification against internationally recognised certification schemes such as the Forest Stewardship Council (FSC) and Roundtable on Sustainable Palm Oil (RSPO), which include further detailed requirements and verification of company practices in relation to the prevention of forced and child labour, amongst other criteria.

For more detailed information on our approach to managing human rights and other social or environmental risks associated with clients, please see our [2020 ESG Report](#) and [Statements and Policy Positions](#) section of our website.

During 2020, we:

- Conducted reviews of 429 client relationships and transactions for environmental and social risks<sup>4</sup>, undertaken by our Group Sustainability team.

### During 2021, we aim to:

- Continue our partnership with a leading human rights advisory services organisation to improve our understanding of modern slavery risk “hotspots” in our corporate client portfolio, and enhance our approach to addressing these risks.
- Based on this analysis, we will undertake a targeted review of modern slavery risks for corporate clients in at least one high risk sector and/or geography; assessing the risks that clients are linked to modern slavery-related practices and evaluating the maturity of their management approach in addressing these risks.

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<sup>4</sup> **Note:** This figure covers Group Sustainability team client relationship and transaction reviews for both environmental and social risks, and does not cover reviews of modern slavery-related risks only.

## Engagement and Training on Modern Slavery

### External Engagement

We engage in dialogue with a range of stakeholders, including government, law enforcement agencies, non-governmental organisations, and other banks to share our expertise and better understand the role we can play in combatting modern slavery.

During 2020 we:

- Continued to participate in the UK Home Office's Business Against Slavery Forum, a partnership between UK Government and businesses aimed at accelerating progress toward eradicating modern slavery. During the course of the year we supported the Home Office in the testing and deployment of the UK Government's forthcoming database for modern slavery statements.
- Continued our partnership with the Joint Money Laundering Intelligence Taskforce (JMLIT), which assists banks and law enforcement in filling intelligence gaps where suspected money laundering crosses multiple financial institutions. This included contributing to expert and operational working groups on modern slavery and human trafficking threats. Barclays collaborated with UK law enforcement on four modern slavery and human trafficking cases in 2020.
- Participated in a [podcast](#) commissioned by the Independent Anti-Slavery Commissioners Office to discuss the regulation of modern slavery and our response.
- Worked with IBM, Red Compass and Stop the Traffik to assist in the development of the Traffik Analysis Hub. This technology was introduced to facilitate the sharing of international data across all industries and sectors
- Continued to participate in the 'Thun Group', an informal group of banks working to further understanding on how the UN Guiding Principles on Business and Human Rights can be applied to the banking sector. During the year we facilitated a discussion on modern slavery with member banks and representatives from the UN PRI and the Liechtenstein Initiative for a Financial Sector Commission on Modern Slavery and Human Trafficking.

### During 2021, we aim to:

- Continue building upon our public and private sector partnerships to enhance our ability to collectively tackle modern slavery.

## Training and Awareness Raising

Barclays is committed to providing training for its employees on the issues of modern slavery and human trafficking. Modern slavery content is included in our mandatory financial crime e-learning modules, which all Barclays staff are required to complete on an annual basis. All Procurement, Events & Hospitality and Corporate Real Estate colleagues globally must also complete a dedicated modern slavery e-learning module on an annual basis, which focuses on how employees can identify and mitigate modern slavery and human trafficking risks in our operations and supply chain. We host tailored events and webinars for staff across the Barclays businesses and functions who wish to further their knowledge on this subject, or where we have identified that they may be in roles with a heightened exposure to modern slavery risks.

During 2020, we:

- Held an Agriculture Sector Against Modern Slavery awareness week aimed at upskilling approximately 150 banking colleagues who service agricultural clients on the modern slavery risks present in the agricultural sector in the UK. We also introduced an escalation process to allow colleagues to raise concerns in a timely manner during the key picking seasons.
- Delivered an awareness campaign focused on sexual exploitation on Anti-Slavery Day aimed at all UK based colleagues operating in customer facing, investigations and business oversight roles. The campaign provided guidance on the current risks, definitions and indicators of sexual of scenarios.

### During 2021, we aim to:

- Continue to deliver targeted modern slavery training and awareness raising sessions to colleagues.

## Survivor Inclusion Initiative – Working to improve access to banking services for survivors of human trafficking and modern slavery

Survivors of modern slavery often have no access to banking services in their destination country, or have had their bank account hijacked by their controller. As a result, these individuals are often unable to produce the everyday documents needed to pass banks' Know Your Customer (KYC) standards, and therefore may not be able to access conventional banking products or services.

To help address this issue, last year Barclays became a participating member of the Finance Against Slavery and Trafficking (FAST) Project, an initiative led by the United Nations. The objective of the project is to improve financial access for survivors of modern slavery and human trafficking around the world. Banks across the UK, USA, Netherlands, Australia & Canada are all part of this project.

Since its launch in September 2019 Barclays has been supporting survivors of human trafficking and modern slavery to open bank accounts in our branches, and we have worked with the Salvation Army and Hope for Justice to support them in doing so. We work with survivors to carefully understand what documents they are able to provide, and assist them in opening new accounts by using a dispensation and vulnerability process that accepts these documents as required based on their particular situation. We opened our first account as part of FAST in October 2019 and have opened at least an additional five accounts during 2020. We may also have assisted in opening additional accounts for survivors but where the customer has not declared their survivor status. Barclays are committed to supporting this initiative for the foreseeable future and we are working with our frontline teams to proactively improve the support we provide in account opening for vulnerable customers.

## Assessing the Effectiveness of Our Actions

Through the oversight arrangements detailed in our governance process (please refer to the section titled “Governance”) we are able to review the effectiveness of our modern slavery actions. Where modern slavery concerns with a particular supplier are identified during the supplier assurance process, this will be monitored through to satisfactory closure, including review by the appropriate subject matter expert within Barclays.

During 2020 we achieved all but one of the activities proposed for the year in our previous Group

Statement on Modern Slavery. The activity not fully achieved relates to undertaking a deep dive review of modern slavery risks linked to clients in one high risk sector. This activity was postponed due to the additional time required for the information gathering and sector prioritisation tasks that underpin this sector review, and we are committed to undertaking this activity in 2021.

We recognise that modern slavery is a hidden risk, and that evaluating our approach and progress is complex. We currently track the following selection of metrics, which includes new metrics introduced in 2020, in order to better understand the effectiveness of our approach and seek to evolve and enhance our monitoring approach over time.

Area	KPI	2020	2019
Colleagues	% of assigned colleagues in Sourcing, Corporate Real Estate Services and Events and Hospitality functions completing modern slavery training <sup>5</sup>	98.0%	99.3%
	# of substantiated incidents related to modern slavery or human trafficking concerns raised through our Raising Concerns reporting channels	0	–
Suppliers	% of managed suppliers who have undergone assurance activity in the last 12 months (excludes supplier panels)	83.0%	–
Retail Customers	# of survivors assisted through opening of survivor bank accounts	5	–
Corporate Clients	# of client relationships and transactions reviewed for environmental and social risks by Barclays Group Sustainability team <sup>6</sup>	429	292

<sup>5</sup> **Note:** Metric based on the percentage of assigned sourcing colleagues completing the 2020 Modern Slavery Training Module before 29 January 2021. Data is derived from Barclays internal Learning Services portal.

<sup>6</sup> **Note:** Metric covers Group Sustainability team client relationship and transaction reviews for both environmental and social risks, and does not cover reviews of modern slavery-related risks only. This number has increased significantly during 2020 primarily due to the implementation of new enhanced due diligence process for clients covered by Barclays Climate Change Statement.

## Statement Review

The statement has been approved by the Board of Barclays PLC on 17 February 2021 and has been signed on its behalf by the Barclays Group CEO and Chairman.



**James E. Staley, Group Chief Executive**  
Barclays PLC



**Nigel Higgins, Chairman**  
Barclays PLC

17 February 2021

## Appendix: Scope of Statement

This statement covers the following subsidiary companies of Barclays PLC that are required to have a statement under the UK Modern Slavery Act 2015:

- Barclays PLC
- Barclays Bank PLC
- Barclays Execution Services Limited
- Barclays Bank UK PLC
- Clydesdale Financial Services Limited
- Barclays Insurance Services Company Limited
- Barclays Investment Solutions Limited
- Barclays Capital Securities Limited
- Barclays Mercantile Business Finance Ltd
- Barclays Unquoted Investments Limited
- Hawkins Funding Limited
- Relative Value Investments UK Limited Liability Partnership
- RVT CLO Investments LLP
- Real Estate Participation Management Limited

This statement covers the following subsidiary companies of Barclays PLC that are required to have a statement under the Australian Commonwealth Modern Slavery Act 2018:

- Barclays Capital Asia Ltd
- Barclays Bank PLC