



UNION BANCAIRE PRIVÉE

Union Bancaire Privée, UBP SA, London Branch

Modern Slavery and Human Trafficking

Statement 2018

Introduction:

This statement is made in accordance with the provisions of section 54 of the UK Modern Slavery Act 2015 (the "Act"). The serious criminal offences of slavery, servitude, forced or compulsory labour and human trafficking are brought together under one piece of legislation. The intention of the Act is to protect victims, bring perpetrators to justice and provide more effective tools for law enforcement. Union Bancaire Privée SA London branch (UBP) strives to ensure that slavery and human trafficking is not taking place within our business or supply chain.

Our Business:

Union Bancaire Privée (UBP) offers wealth management services to both private and institutional clients.

Our People:

UBP has a global workforce which is predominantly made up of professionally qualified and skilled employees and, accordingly, we consider the risk of modern slavery occurring within our business to be low.

Our Policies:

We promote high ethical standards and have an internal Whistleblowing policy whereby employees can raise concerns regarding unethical behaviour or decisions that could indicate wrongdoing. In all our business dealings and relationships, we seek to act with honesty and integrity and have implemented a number of internal policies which set out clearly how we expect employees to act. These include policies such as: Staff Handbook, Anti-money laundering, Anti-bribery & Corruption, Code of Conduct, Inducements and Whistle-blowing. As an FCA / PRA Regulated entity, UBP adheres to the various codes of conduct expected of us by our Regulators.

Our Due Diligence Process:

UBP is strongly opposed to slavery and human trafficking and does and will not knowingly support or conduct business with any organisation involved in such activities.

Our Supply Chains:

UBP relies on the use of third parties to support high quality, effective and efficient delivery of our services to clients and we expect all of our suppliers to operate in a responsible, ethical, open and transparent way and in compliance with all applicable laws and regulations. We use mainstream suppliers who are subject to the same regulations as UBP.

Our Training:

Modern Slavery awareness training forms part of our training plan for all staff.

Governance:

This statement has been reviewed and approved by the UBP Management Committee, and constitutes the UBP slavery and human trafficking statement for 2018.