

# UK Modern Slavery Act Statement 2023

## 1. Scope of 2023 Statement

This Modern Slavery Statement ('Statement') is made by Coöperatieve Rabobank U.A. ('CRUA') inclusive of the UK Branch of Rabobank ('RBUK'), pursuant to s.54 of the UK Modern Slavery Act 2015 ("the Act"). This Statement sets out the steps taken by CRUA and RBUK (together 'Rabobank Group' or 'Group') to identify, assess and address slavery and human trafficking (hereafter "Modern Slavery") risks across the Group's operations and supply chains for the financial year of 1 January 2023 to 31 December 2023<sup>1</sup>. Within this Statement, references to 'we', 'us' or 'our' should be read as a reference to Rabobank Group unless explicitly stated otherwise.

Where this Statement refers to Rabobank Group policies, these policies generally apply across Rabobank Group (including RBUK). However, the operationalisation of such policies may vary between different regions and subsidiaries, due to localisation to meet country specific laws or requirements, and/or due to differing stages of implementation as well as to take account the differing business activities and risks. Where RBUK follows additional or different processes, this has been highlighted throughout the Statement.

## 2. About Rabobank Group

### 2.1 Our Structure

CRUA is a cooperative formed under the laws of the Netherlands with its statutory seat in Amsterdam, the Netherlands. CRUA is the head entity of the international Rabobank Group, which is a financial services organisation with over 49,000 employees, and operations in 36 countries across Europe, North America, South America, Africa and the Asia-Pacific region. In some regions in which it conducts business, CRUA operates as a branch, either on its own, or with subsidiaries which provide financial services in their own right.

The countries in which Rabobank Group operates through one or more of its entities are:

Argentina	Chile	Hong Kong	Kenya	Portugal	Switzerland
Australia	China	Hungary	Mexico	Singapore	The Netherlands
Austria	Denmark	India	New Zealand	South Africa	Turkey
Belgium	Finland	Indonesia	Norway	South Korea	United Arab Emirates
Brazil	France	Ireland	Peru	Spain	United Kingdom
Canada	Germany	Italy	Poland	Sweden	United States of America

### 2.2 Our Operations

Rabobank Group is a cooperative banking organisation headquartered in the Netherlands with a history dating back over 125 years. Rabobank Group is a global financial services provider and one of the world's largest private banks. The Group focuses on delivering a full suite of financial services in the Netherlands and on serving our Food and Agriculture clients worldwide. Rabobank Group services clients in the Retail Banking, Private Banking, Wholesale Banking, Rural Banking, Vendor Finance, Leasing, and Property Development sectors. Rabobank Group also includes subsidiaries BPD, Obvion, and DLL, which provide, respectively, real estate, mortgage, and leasing solutions.

Rabobank's UK business focuses on corporate banking and markets activity exclusively with wholesale clients, primarily conducted through its UK Branch which has supported the UK Food and Agribusiness for over 40 years and has over 500 employees. UK offerings include debt products, receivables & payables finance and a range of hedging and risk management products. Our UK activities are regulated by the UK Financial Conduct Authority ("FCA") and UK Prudential Regulation Authority ("PRA").

<sup>1</sup> The operations of De Lage Landen Pty Limited / De Lage Landen Leasing Limited ('DLL') are not within the scope of this statement. DLL is a wholly owned subsidiary of De Lage Landen International B.V. which in turn is a wholly owned subsidiary of CRUA., however DLL is operated and managed separately and produces its own Modern Slavery Statement.

### 2.3 Our Supply Chains

Globally, the main categories of suppliers to Rabobank Group cover services relating to information technology and telecommunications, property and facilities management, professional services and human resources services.

At a UK level, we have a relatively simple supply chain built around supporting our UK business and technological infrastructure. We utilize external suppliers predominantly for the purposes of providing IT software and hardware, office supplies, food and catering, cleaning and security. We also utilize suppliers to support our hiring, training and staff benefit programs, as well as for providing ad-hoc professional advisory services.

## 3. Prevalence, Assessment and Management of Modern Slavery Risks

Internationally, Rabobank Group is a leading financier in food and agribusiness, a sector that comes with risks such as labor abuse, and dangerous working conditions. We support the elimination of all forms of Modern Slavery. Rabobank Group takes seriously its obligations in relation to the identification, mitigation, remediation and reporting of Modern Slavery. We set out below how we identify and address Modern Slavery risks in our own operations and value chains.

### 3.1 Our Key Policies, Standards and Procedures

As a values driven organization, we set out the conduct standards we expect of our staff in a number of policies, standards and procedures as well as in the Rabobank Group code of conduct ('Compass')<sup>2</sup> available [here](#).

As an entity which supports the elimination of all forms of Modern Slavery, we have voluntarily committed to a number of international standards including the following (without limitation) which support the values of the Act:

- UN Sustainable Development Goals
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises

Further, Rabobank Group has in place a number of policies, standards and procedures aimed at identifying and mitigating the risk of Modern Slavery occurring in our own operations and across value chains. Our policies also clarify what we expect of clients and/or business partners in relation to identifying, preventing, mitigating and remediating potential and actual MS impacts in their own operations and across their value chains, and provide a basis for our actions set out further below. Our key global policies, standards and procedures include the following (without limitation):

- Sustainability Policy Framework (inclusive of core-policies on Human Rights and Labor Rights) (published [here](#))
- Global Policy on Procurement
- Global Standard on Sourcing and Supplier Management
- Global Whistleblowing Policy
- Global Standard on Customer Due Diligence
- Global Standard and Procedure on Sanctions

These are supported by additional UK policies, standards and procedures which include the following (without limitation):

- UK Whistleblowing Policy
- UK Health & Safety Policy

<sup>2</sup> Note this is applicable to Rabobank Group excluding BPD and Obvion.

### 3.2 Our Own Operations

Rabobank Group is committed to upholding the fundamental principles and rights described in the core conventions of the International Labour Organization (ILO) as set forth in the Declaration on Fundamental Principles and Rights at Work, by avoiding causing or contributing to the violation of labor rights, and remediating actual labor rights impacts where we have caused or contributed to these.

We promote a high standard of integrity across our organization and seek to provide our employees with a safe and supportive working environment. We have dedicated human resource specialists to support our employees across the globe, and ensure that relevant employment laws and protections are adhered to.

Our Global Whistleblowing Policy provides a basis for individuals (whether internal or external persons) to raise concerns without fear of victimization, retaliation or other negative effects. The Policy facilitates the raising of concerns on a variety of topics, including Modern Slavery. The full Policy is available [here](#). The Global Policy against Harassment sets out that all workers treat others, and are themselves, treated with dignity and respect to create a working environment which is free from any form of harassment. In addition, in the Netherlands, Rabobank and Obvion employees fall under the Collective Labor Agreement, details of which can be found [here](#).

All RBUK employees are entitled to UK employment law protections, occupational health and wellbeing support and a benefits package. The UK Branch remains an accredited London Living Wage Employer, as certified by the Living Wage Foundation. Where our property and facilities management staff are contracted through external vendors, the vendors are subject to the supplier checks and controls set out below and must additionally provide Modern Slavery Statements or similar policies. We also act in accordance with the Professional Standards Handbook of the Institute of Workplace and Facilities Management which emphasizes the importance of conducting responsible business. Key employee policies at the UK Branch level include the UK Anti-bullying and Harassment policy and the UK grievance policy which allows individuals to raise concerns about their working environment (amongst other things). In addition, the UK Whistleblowing policy is available (without limitation) to employees to raise concerns confidentially or anonymously, including Modern Slavery concerns. All staff also have access to a free confidential advice line provided externally by Protect, a UK whistleblowing charity. Employees also have access to an employee assistance program (provided by an independent third-party company) that may be used for confidential advice in relation to workplace concerns.

#### 3.2.1 Our Clients and their Value Chains

Rabobank Group may be exposed to risks of modern slavery where our clients are engaged in industries or countries characterized with such risks, as well as through the activities of businesses in which we invest as a bank. A number of policies, procedures and tools are in place to identify, prevent, mitigate and report on the Modern Slavery risks arising throughout our client relationships.

As per the Sustainability Policy Framework, Rabobank Group expects its clients to respect human rights in their business decisions, as described in the UN Guiding Principles on Business and Human Rights (UNGPs) and we expect them to require their suppliers to do the same.

Rabobank Group conducts a dedicated sustainability assessment as part of the credit approval process for rural, corporate and Dutch retail clients above a certain credit exposure, based on its Sustainability Policy Framework. This is done through our three internal sustainability tooling systems: Rural Client Photo ('RCP'), Planet and the Sustainability Matrix. The tools are used to assess our Rural clients, Wholesale clients and Dutch Retail business clients respectively against all relevant aspects of Rabobank's Sustainability Policy Framework applicable to the clients, including human rights and labor rights. This requirement is completed by those with proximity to and knowledge of the client, i.e. the relationship management team. Where assessment results highlight areas for improvement or issues, discussion with the client will take place with a view to agreeing remedial actions within specified timeframes. Where such actions are not completed, we may take further steps including refusal to issue or extend new funding to that client or ultimately off-boarding the client. The sustainability assessment is typically reviewed annually alongside the credit review.

For a subset of the above corporate clients, an additional in-depth sustainability assessment (ISA) is required to be completed. This occurs in case certain criteria are triggered which point at a high sustainability risk

related to a client or transaction. The high sustainability risk could manifest itself through possible human rights violations, lack of adherence to local labor laws, workplace safety considerations and whether the client conducts due diligence on its value chain to identify and address violations, such as child labor and forced labor. Aside from this, where potential issues/controversies come to the Rabobank Group's attention (e.g. on an ad-hoc basis through adverse media articles), these will be investigated and discussed with the client. Where the potential issue is confirmed by the client to be true, further engagement takes place to ensure the client reaches a solution or agreement to remedy or compensate the damage done. As an ultimate resort, where no solution or agreement on remediation can be reached, the client may be exited.

In accordance with our Sustainability Policy Framework (linked above), we monitor the performance and progress of clients during the initial credit assessment and at periodic intervals.

In addition, UK clients and financial institution counterparties are subject to adverse media screening at onboarding which includes consideration of Modern Slavery topics. Subsequent daily checks and 1-5 year periodic reviews take place thereafter in accordance with the client's overall risk rating. These checks are conducted by our Wholesale CDD teams.

### 3.3 Our Supplier Relationships

Supply chain pressures are a known risk factor for Modern Slavery. Accordingly identifying any Modern Slavery risks associated with our procurement of goods and services remained important to Rabobank Group during the reporting period. We note that as Rabobank Group operates globally in 36 countries, the risk of Modern Slavery may be higher amongst suppliers based in countries with comparatively weaker labor protection laws or enforcement. Based on our supplier related framework as described below, no specific instances of Modern Slavery were reported in our supply chains in 2023.

Rabobank's Global Standard on Sourcing and Supplier Management (the 'GSSSM') came into effect in January 2022. It currently applies across Europe (including the Netherlands and the UK) and South America, and is being rolled out across the remaining regions globally in phases. For such regions not yet in scope of the GSSSM, suppliers are subject to a Business Partner Risk Assessment which includes a requirement for the supplier to accept the Rabobank Group Sustainability Statement. By accepting the Statement, the suppliers confirm that they agree to comply with the Sustainability Policy Framework which includes requirements on human rights and labor rights and to inform us when they cannot do so.

For those regions subject to the GSSSM, a Procurement-led screening process is in place which sees prospective suppliers screened against a variety of sanctions, corruption and armaments related exclusions. The final supplier of choice is then subject to a full risk assessment which includes a requirement to sign up to the above mentioned Sustainability Statement. In addition where the annual spend on a contract is estimated to be equal or greater than 250.000 EUR (Excl. VAT), the supplier is required to obtain an Independent Sustainability Rating Report from EcoVadis, and share their scorecard with us within 6 months of signing the contract. This requirement has applied to new contracts since February 2022 and will be applied to existing contracts at the point of renegotiation. Scores are given on four themes selected at CRUA level: Environment, Ethics, Labor and Human Rights and Sustainable Procurement in the supply chain. The rating must be renewed annually in order to remain valid. Subsequent periodic reviews of the suppliers are completed in accordance with their inherent risk rating. In exceptional cases where a supplier is unable to meet Rabobank Group's requirements, there will be an internal escalation for decision on whether to proceed (for example by satisfying alternative but equivalent standards) or whether to ultimately end the supplier relationship. We are in the process of reviewing legacy suppliers against the current criteria.

In addition to the above, suppliers servicing the UK Branch are subjected by the Branch to Modern Slavery related adverse media checks at initial onboarding. Subsequent daily checks and 1-5 year periodic reviews take place thereafter commensurate with the supplier's risk rating. Suppliers rated medium or high and with an annual turnover exceeding the £36million specified under the Act must additionally provide a copy of their Modern Slavery Statement.



#### 4. Monitoring, Next Steps and Other Relevant Matters

Rabobank Group continues to focus on ways to improve the identification and mitigation of the risk of Modern Slavery within its own business operations and across its value chains. As part of this, various internal stakeholders have come together (commencing 2023) to exchange ideas periodically on this topic.

Other improvements include periodic reviews of policies, procedures and assessment criteria. The Rural Client Photo (set out above) was updated in 2023 to include an additional human rights question which allows for the capture of Modern Slavery considerations.

As part of its existing commitment to the UNGP, in 2023 Rabobank Group commenced a human rights saliency assessment across several of its global client-facing business activities to identify and assess the most salient risks of potential human rights impacts arising from its client relationships and value chain as part of its human rights due diligence process. The human rights saliency assessment will be completed in 2024 and includes labor rights considerations. The assessment further supports evaluating whether our actions to assess and address modern slavery risks are effective or will require strengthening going forward.

At a UK level, Modern Slavery awareness sessions were duly completed in 2023. These were directed at senior managers within the business. Furthermore, the UK Whistleblowing policies have been updated with express reference to the Act.

Lastly, Rabobank Group's sustainability performance is assessed by various independent Environmental Social Governance (ESG) rating agencies. ESG rating agencies review and assess companies on various elements of risk and ESG performance, including to varying degrees, performance in relation to human rights and/or Modern Slavery aspects. Where relevant, these ratings are taken into account to help us to assess, address and improve our response in relation to Modern Slavery risks.

#### 5. Consultation process



This Statement has been considered by, and supported or approved by the following departments, management and governing bodies:

1. General Manager, Rabobank UK Branch
2. Management Team of Rabobank's global Wholesale & Rural division; and
3. Managing Board of CRUA., based in the Netherlands.

This Statement was also prepared in consultation with representatives from Rabobank Group's Sustainability, Financial and Economic Crime; Procurement & Vendor Management, Compliance, Legal and Human Resources domains as well as representatives from RBUK's Financial and Economic Crime Operations, Executive & Branch Support, Facilities, Compliance, Legal and Human Resources teams.

#### Approval Statement

This statement has been produced in accordance with the requirements of section 54 of the United Kingdom Modern Slavery Act 2015.

<p><i>[signature]</i></p> 
<p>Will Jennings, General Manager, RBUK</p>
<p><i>(Date)</i></p>
<p><i>[signature/s]</i></p> 
<p>MB member(s), CRUA</p>
<p><i>(Date) 24 May 2024</i></p>