浦发银行
SPD BANK

Statement on Modern Slavery
and Human Trafficking

Shanghai Pudong Development Bank Co., Ltd., London Branch.

March 2026

Introduction

This statement is made in accordance with section 54 (1) of the Modern Slavery Act 2015 (the 'Act') and applies to Shanghai Pudong Development Bank Co., Ltd., London Branch ("SPDB").

Modern slavery and human trafficking ("MSHT") are violations of fundamental human rights and are offences under the Modern Slavery Act 2015 ("MSA 2015").

Shanghai Pudong Development Bank Co., Ltd., London Branch has a zero-tolerance approach to MSHT and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to seek to ensure that neither slavery nor human trafficking is taking place in its business or in any of its supply chains.

This statement outlines the practices and procedures we have in place to ensure our business and supply chains remain clear of MSHT.

Our organisation

Shanghai Pudong Development Bank Co., Ltd., London Branch (the "Branch") is a UK establishment of Shanghai Pudong Development Bank (the "Group") incorporated in China. The Branch was established in December 2017. The Branch is authorised and regulated by National Administration of Financial Regulation (in China) and subject to regulation by the Financial Conduct Authority ("FCA") and limited regulation by the Prudential Regulation Authority.

Shanghai Pudong Development Bank Co., Ltd., London Branch providing services to large corporations and engaging with other financial institutions. These banking activities are carried out through the Bank's customer facing financial markets and corporate banking departments.

Our supply chains primarily include professional services providers, IT vendors, facilities management services and other office-related suppliers.

Our MSHT Policy

Our supply chains include a range of outsourcing, subcontracting and procurement of goods and services.

Shanghai Pudong Development Bank Co., Ltd., is committed to maintaining a high standard of integrity and professionalism and ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business. We have zero-tolerance approach to MHST and have developed an internal policy to help ensure the prevention of MSHT (the "Policy").

The Policy reflects our ongoing commitment to this approach and to implementing and enforcing effective systems and controls to ensure these ideals are reflected in our business practices and operations.

We assess the risk of modern slavery and human trafficking across our operations and supply by considering factors such as geographic exposure, the nature of services provided, and the type of suppliers engaged. Given the nature of our business as a financial institution operating primarily in the UK, we currently assess the risk of MSHT in our direct operation's as low. However, we recognise that risks may arise with our supply chains and continue to monitor these areas.

The Policy ensures that there is rigour and transparency in our business operations and in our approach to preventing MSHT. In particular, the Policy provides for:

(i) *Awareness & Training*

- by acknowledging that training is fundamental to raising awareness of MSHT, and thereby helping prevent it. Shanghai Pudong Development Bank Co., Ltd., London Branch has, over the past financial year, continued to provide online training programmes for all its employees, which informs them of Shanghai Pudong Development Bank Co., Ltd., London's obligations under the MSA 2015.
- All employees are required to complete mandatory training on an annual basis, with enhanced training provided to staff in higher-risk roles, including procurement and client-facing functions.

(ii) *Detection & Prevention*

- Implementation of a comprehensive procurement process comprising of enhanced due diligence processes for all business partners and suppliers and ongoing monitoring for the duration of our contractual relationships with such parties.
- This includes risk-based supplier onboarding checks, contractual obligations requiring compliance with applicable anti-slavery laws, and ongoing monitoring and review of supplier relationships.

(iii) *Monitoring & Reporting*

- processes to ensure that the Policy is monitored, that it is complied with by all employees and to evaluate its effectiveness;
- an ongoing commitment to recording occurrences of any alleged or actual incidents of MSHT and the prompt investigation into any such incidents; and
- a commitment to reporting any alleged or actual instances of MSHT to the relevant external authorities.
- Employees and third parties may raise concerns through confidential whistleblowing channels, which are designed to protect individuals who report concerns in good faith.

Conclusion

Due to the nature of Shanghai Pudong Development Bank Co., Ltd., London's business and its approach to governance. Shanghai Pudong Development Bank Co., Ltd., London Branch assesses that there is currently a low risk of MSHT in its business and supply chains.

Nevertheless, Shanghai Pudong Development Bank Co., Ltd., London Branch will continue to monitor and review the effectiveness of its relevant policies and procedures and will conduct regular checks on their effectiveness in helping combat MSHT.

Approvals

This statement is made pursuant to section 54(1) of the MSA 2015 and constitutes Shanghai Pudong Development Bank London Branch's statement on Modern Slavery and Human Trafficking for the financial year ending 2025/26.

For and on behalf of the Shanghai Pudong Development Bank Co., Ltd., London Branch

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