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# Statement on Modern Slavery

2026

**AIB Group Plc**

This Statement is made in accordance with section 54(1) of the UK's Modern Slavery Act 2015. It sets out the steps taken by AIB Group plc and its subsidiaries during year ending 31 December 2025 to prevent modern slavery and human trafficking ("Modern Slavery") in our business and supply chain and its subsidiaries.

This statement will be published on the websites of AIB Group plc, AIB Group (UK) and Goodbody.

## Contents

1. INTRODUCTION .....	1
2. OUR BUSINESS AND STRUCTURE .....	1
3. OUR PURPOSE AND VALUES.....	2
4. OUR POLICIES.....	2
5. RISK MANAGEMENT FRAMEWORK.....	3
5.1 Risk Assessment.....	3
5.2 Due Diligence.....	3
5.3 Risk Management .....	4
5.4 Responsible Practices and Stakeholder Engagement .....	4
5.5 Supplier Management .....	5
6. HUMAN RIGHTS .....	6
7. GRIEVANCE MECHANISMS.....	6
8. TRAINING .....	7
9. MEASURES AND INDICATORS .....	7
10. PROGRESS IN 2025 .....	8
11. FOCUS AREAS IN 2026 .....	8

## 1. INTRODUCTION

AIB Group recognises its responsibility to help prevent Modern Slavery within the financial services sector and the broader communities in which we operate. Due to our significant operations in Ireland and the UK, we acknowledge the influence we can exert through ethical business conduct, responsible finance, and robust supply chain oversight.

This statement reaffirms our commitment to human rights and equality, outlining the governance structures and oversight mechanisms already in place. In 2026, we will continue to work with our suppliers and maintain effective channels for reporting concerns related to Modern Slavery.

## 2. OUR BUSINESS AND STRUCTURE

This Modern Slavery Statement outlines the actions taken by AIB Group plc, Allied Irish Banks p.l.c., AIB Group (UK) plc and Goodbody Stockbrokers UC ('Goodbody'), collectively 'AIB Group', during the fiscal year ending 31 December 2025 to prevent Modern Slavery and human trafficking across our operations and supply chain.

Incorporated in Ireland in 1966 as Allied Irish Banks Limited, and headquartered in Dublin, Ireland, we have a long-standing presence in the financial sector. We operate predominantly in Ireland and the United Kingdom. AIB UK forms part of the Group’s wider footprint across Britain and Northern Ireland, serving corporate, business, and retail customers. Our shares are quoted on Euronext Dublin and the London Stock Exchange, and we are a member of the FTSE4Good Index.

Our business lines are Retail Banking (incl. AIB UK), Climate & Infrastructure Capital, and Capital Markets, which includes Goodbody, a leading financial services firm which has been serving and growing client relationships for 150 years. It is a full service, investment-led business offering wealth management, investment management, and investment banking services with key operating jurisdictions of Ireland and the UK.

As one of Ireland’s largest financial services groups, we have significant reach into society, creating value and making impact through our activities. Through our work we aim to make real and meaningful change in addressing the many challenges and opportunities that face society today and into the future.

### 3. OUR PURPOSE AND VALUES

Across AIB Group, our purpose is empowering people to build a sustainable future. Our values guide how we work, how we make decisions, and how we deliver for our customers, colleagues, and wider stakeholders. Our current strategy focuses on three strategic priorities: Customer first, Greening our business and Operational efficiency & resilience.

### 4. OUR POLICIES

We maintain a comprehensive suite of policies that support ethical business conduct and the prevention of Modern Slavery. Policy links are provided alongside each item, with internal-only policies noted by exception.

Table 1: AIB Group Modern Slavery Policies

Policy Name	Purpose / Description	Link
<b>Code of Conduct</b>	Sets out clear expectations for how we behave and how we do business. <sup>1</sup>	<a href="#">AIB Code of Conduct</a>
<b>Human Rights Commitment</b>	Outlines our commitments to respecting human rights, equality, dignity, and fair treatment across all operations.	<a href="#">Human Rights Commitment</a>
<b>Whistleblowing Policy</b>	Provides secure channels for reporting concerns about wrongdoing, including Modern Slavery, ensuring confidentiality and protection for whistleblowers.	<a href="#">Whistleblowing Policy</a>
<b>AIB Responsible Supplier Code</b>	Sets out our expectations for suppliers to operate in a responsible, ethical and sustainable manner, aligned with AIB’s economic, social and environmental values.	<a href="#">Responsible Supplier Code</a>

Policy Name	Purpose / Description	Link
<b>Financial Crime Framework</b> (incorporating Anti-bribery and Corruption)	Sets controls to prevent bribery, corruption, and unethical practices within the organisation and supply chain.	<a href="#">Financial Crime Statement</a>
<b>Grievance Policy</b>	Provides another mechanism for our employees to raise concerns, if they feel they have been mistreated or subject to behaviours contrary to our Code of Conduct. <sup>1</sup>	Grievance Policy is available internally only

<sup>1</sup> Goodbody has a standalone Code of Conduct and Grievance Policy aligned in principle with AIB Group's Policy.

We make all employees aware of our policies and standards and provide bespoke training. AIB Group maintains governance and oversight arrangements in relation to company policies and completes annual reviews and updates as necessary. Learn more by reading our publicly available codes and policies on the Sustainability page of the AIB Group website [here](#).

## 5. RISK MANAGEMENT FRAMEWORK

The Group uses a comprehensive risk management approach across all risk types. This is outlined in our Risk Management Framework (RMF) including the key practices that are implemented in managing risks. AIB Group applies a consistent, risk-based Supplier Relationship Management (SRM) standard approach to prioritise resources for maximum customer outcomes while maintaining ongoing oversight of third-party performance and risks.

### 5.1 Risk Assessment

Our Business Customers are subject to a Financial Crime Risk Assessment. We conduct adverse media searches on business accounts at onboarding and on an ongoing basis. This helps identify any public information that may indicate Modern Slavery or breaches of employment law, such as breaking minimum wage requirements. The Group customer account opening process includes a well-established customer screening approach. This risk-based approach to customer due diligence ("CDD") assesses the underlying money laundering risk associated with each customer. The customer risk assessment methodology applies additional risk ratings to certain business customers which are deemed to be at a higher inherent risk of Modern Slavery as a result of their particular manner of operation and/or supply chain or other factors. Where we identify or have reason to believe a relationship presents the potential of Modern Slavery or the exploitation of low paid workers, we would reject such business. For our UK Business customers, <sup>2</sup> we seek evidence of the customer's Modern Slavery Statement, where they are required to produce one, in accordance with the UK Modern Slavery Act 2015.

### 5.2 Due Diligence

As an integral part of our risk assessment procedures, due diligence is the process of thoroughly investigating and assessing a business, investment, or individual to verify facts, identify risks, and ensure informed decision-making. This section focuses on the actions we take to implement our policies and respond to actual and potential risks of Modern Slavery in our business and supply chains.<sup>1</sup>

<sup>2</sup> Not applicable to Goodbody UK Customers

All front-line staff are trained to identify customers in need of additional support including situations where the customer is not in control of their documents or where it looks like they may not be acting of their own free will. Supports are available for staff where there is a concern for a customer. This includes dedicated vulnerability support teams in ROI and UK who provide expert advice to frontline staff. These supports are available to all customers in need of additional support including those at risk of exploitation.

In terms of our supplier relationships, our due diligence reflects the nature, value, complexity, and criticality of the service we are procuring. We use market intelligence, specific selection criteria, and best-in-class selection tools to help us choose the most appropriate suppliers. For high-value and high-risk services, we perform specific due diligence checks on the supplier and their proposed service model. We subject lower-value and/or lower-risk suppliers to routine company financial and sanction scanning checks.

We also provide our suppliers with additional guidance and tools in our Sustainability Handbook, available on our website, to support effective due diligence within their own organisations. This includes guidance from the Organisation for Economic Co-operation and Development (OECD), whose *Due Diligence for Responsible Business Conduct* outlines a step-by-step process for integrating due diligence into procurement activities. The six steps are: 1) Embed responsible business conduct into policies & management systems, 2) Identify & assess adverse impacts in operations, supply chains & business relationships, 3) Cease, prevent or mitigate adverse impacts, 4) Track implementation and results 5) Communicate how impacts are addressed and 6) Provide for or cooperate in remediation when appropriate. Learn more about our Sustainability Handbook by reading [here](#).

### **5.3 Risk Management**

A part of our broader risk-management procedures, Suspicious Transactions Reports (STRs) or Suspicious Activity Reports (SARs) play a pivotal role in the fight against money laundering and terrorist financing in the jurisdictions we operate. It is a regulatory requirement to report on STRs and SARs. Information provided in STRs/SARs assist local Financial Investigation Units in their investigations, resulting in the disruption of criminal and terrorist activities, and can ultimately result in prosecution and imprisonment. The reports also provide valuable intelligence on trends and typologies.

### **5.4 Responsible Practices and Stakeholder Engagement**

By embedding responsible and sustainable business practices across our own operations and supply chain, we aim to play an active role in protecting the environment and supporting broader social well-being. Our value chain encompasses a range of activities and stakeholder relationships, which we rely on to provide banking products and services. Suppliers form a key stakeholder group and we engage with them regularly through multiple channels, including our due-diligence processes and through our Responsible Supplier Code and Supplier Handbook. We are proud to be committed to the United Nations Global Compact (UNGC), the World's largest corporate sustainability initiative. The UNGC aims to inspire businesses globally to adopt sustainable and socially responsible practices. It provides a principles-based framework built

around ten core principles covering human rights, labour standards, environmental stewardship and anti-corruption. Please click [here](#) to find out more about Our Stakeholder Engagement on page 48 of our Annual Financial Report (AFR) 2025.

## **5.5 Supplier Management**

We have a broad range of suppliers across multiple categories, with 3,924 active suppliers on our database, and we transacted with 2,478 of these in 2025 (as per ‘Management of our Supplier Relationships’ [here](#) on page 99 of our AFR 2025). The largest cohort of our suppliers are based in Ireland (67%). A further 25% are based in the UK, and the remaining 8% are in other locations, mostly other European countries and the USA. Our suppliers are mainly professional services, business services, office space leasing, facilities and waste management, and IT service providers. We segment our supplier base into five risk tiers, based on the risk and criticality of the service they provide. The closest management, oversight and governance is accorded to risk tier 1 suppliers who provide critical services to us. Each segment attracts a different supplier treatment strategy appropriate to the scale and criticality.

An important aspect of our risk management approach is our Responsible Supplier Code (“the Code”), which outlines our commitment to collaborate with our suppliers to share expertise, ensuring the delivery of high quality products and services while effectively managing and mitigating associated risks. The Code sets out our expectations for our suppliers and the minimum standards they must meet regarding human rights, health and safety, supply chains, inclusion and diversity, and responsible and sustainable business. The Code is based on our Code of Conduct which incorporates our commitments, values and responsible business approach to support the delivery of our business objectives.

The Code is reviewed periodically in conjunction with all relevant stakeholders. The UN Sustainable Development Goals (SDGs) and the Corporate Sustainability Reporting Directive (CSRD) serve as important reference points, helping to ensure that we meet our regulatory requirements while continuing to fulfil our role as a responsible financial institution and key pillar of the domestic economy.

The term ‘Supplier’ as used in this Code refers to suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do or seek to do business with AIB Group. It is expected that suppliers apply similar levels of compliance to their own suppliers or approved subcontractors with whom they work to supply goods and services to AIB. These principles form part of the supplier selection process and are subject to continued monitoring. Where there is a pre-existing relationship with a supplier, the requirements of this Code are in addition, and not in lieu of, any legal or contractual agreement between that supplier and AIB Group.

Supplying goods or services to AIB Group requires suppliers to meet the expectations set out in the Code, comply with all applicable laws in each relevant jurisdiction, maintain these standards throughout their supply chain, and fulfil all contractual obligations to AIB. Depending on the size and risk of the supplier, appropriate policies, training, governance, and compliance programmes should be in place, and these must be effectively communicated and upheld within the organisation. Suppliers are not

required to notify us of changes to their internal policies or practices unless such changes result in an inability to meet the expectations outlined in the Code.

We do not tolerate corruption, discrimination, harassment, child labour, forced labour, or slavery in any form. Our suppliers must adhere to all legal obligations in the jurisdictions in which they operate or provide services, as well as meeting any specific requirements in our own policies. Suppliers are informed about the Code at on-boarding and at each transition through Purchase Order communications.

We also engage with our suppliers through an ESG Questionnaire during the selection process. ESG factors are increasingly important for our own performance, and for our relationships with suppliers. The ESG Questionnaire covers a broad range of ESG areas, and requires responses and evidence from suppliers on their journey to establishing or achieving their Net Zero targets; annual sustainability reports; Scope 1, 2 and 3 GHG emissions; consideration of physical risks from climate change; policies on discrimination, inclusion & diversity, health & safety, Modern Slavery, vulnerable persons, greenwashing, and speaking up; Code of Conduct and their Responsible Supplier Code for their own supply chain; and commitment to ongoing ESG-related training in their organisation.

Please click [here](#) to find out more about the Management of our Supplier Relationships on page 99 of our AFR 2025, and click [here](#) to read more about our Responsible Supplier Code.

## **6. HUMAN RIGHTS**

Our approach to protecting and preserving human rights is underpinned by our Human Rights Commitment, which is available on our website. This commitment has been shaped by the United Nations Guiding Principles on Business and Human Rights, and it is fundamental to guiding our strategic vision, operations, and relationships with stakeholders. Our Human Rights Commitment operates alongside our Code of Conduct and our Responsible Supplier Code. Our commitments are aligned with the laws applicable to the jurisdictions in which we operate; the European Convention on Human Rights (ECHR) and the EU Charter of Fundamental Rights for our business in Ireland.



In line with our Code of Conduct, we actively avoid causing, financing, or contributing to any business activity that is known to breach human rights or fair practices, including taking steps to address any situations that we become aware of where this has occurred. We have due diligence processes in place to help us identify any material negative impacts or risks in relation to human rights. The protection of human rights in our value chain is supported by customer and supplier questionnaires, adverse media monitoring, and grievance monitoring. We will continue to evolve our approach to human rights protection in line with our Human Rights Commitment. We are committed to an inclusive, safe and ethical workplace, as demonstrated within our Code of Conduct and this Human Rights Commitment. Goodbody has their own Code of Conduct which aligns to the principles of Group.

Please click [here](#) to find out more about our Human Rights Commitment on page 88 of our AFR 2025.

## **7. GRIEVANCE MECHANISMS**

We have a range of channels for colleagues, customers, and the wider community to raise concerns about any material impacts of our operations or activities. These include customer engagement and

surveys, our complaints management process, our raising concerns channels, and our formal grievance process, all of which help us to prevent, manage, and remediate potential negative impacts. Please click [here](#) to find out more about Channels for Stakeholders to Raise Concerns on page 89 of our AFR 2025.

	<b>If you believe you or someone you know may have been affected by Modern Slavery, please contact <a href="mailto:whistleblowing@aib.ie">whistleblowing@aib.ie</a> for support and further guidance.</b>
	Please click <a href="#">here</a> for our Whistleblowing Policy.

## 8. TRAINING

We have a dedicated e-learning suite (COMET), which facilitates compliance and regulatory training across topics such as ethics, risk, compliance, IT security, health and safety, plus many more. Our Talent Development team, partners with Compliance, Risk, and relevant business areas to design and implement the courses. These courses apply for all AIB employees, including contractors, and consultants.

Table 2: AIB Group Training

Training	Description	Rate of Completion
<b>Financial Crime</b>	Includes AML, CTF, and fraud risk awareness training	96%
<b>Whistleblowing</b>	Training on reporting channels, protections, and responsibilities	95%
<b>Conflicts of Interest</b>	Guidance on identifying, declaring, and managing conflicts	94%
<b>Sustainability and AIB<sup>1</sup></b>	Covers ESG topics including Modern Slavery awareness	94%
<b>Code of Conduct</b>	Educates employees on the expectations of the Code	95%

<sup>1</sup> 'Sustainability and AIB' training rate does not include Goodbody employees

## 9. MEASURES AND INDICATORS

In addition to the training completion rates outlined above, we report on other key measures and indicators in our AFR and in other relevant reports. The measures below are as of year-end 2025.

<b>10,207</b> Number of Employees	<b>0</b> No incidents of corruption or bribery	
<b>1</b> Incident of discrimination (including harassment) reported	<b>0</b> No human rights issues or incidents were reported with respect to our colleagues, customers and communities	
<b>3,924</b> Active Suppliers in 2025	<b>2,478</b> Suppliers transacted with	<b>81%</b> Payments aligned with standard payment terms of 30 days

## 10. PROGRESS IN 2025

In 2025, we have strengthened our practices to underpin our commitment to preventing Modern Slavery across our value chain:

- We introduced a new Whistleblowing Policy in January 2025, supported by an externally hosted portal that enables anonymous reporting and a Whistleblowing Advocacy Network to guide and reassure colleagues considering raising concerns.
- We published our Supplier Sustainability Handbook on our website in November 2025. The handbook is part of our Responsible Sourcing Programme and has been developed as part of our efforts to improve the sustainability of our procurement activities and improve sustainability maturity amongst suppliers and contractors.
- Our Code of Conduct underwent an annual review and was embedded through training and individual annual attestations.
- In 2025 we launched a new learning course, 'Additional Support for our Customers', which contributed to 66,028 hours of completed training by colleagues to better recognise and support individuals in vulnerable circumstances.
- We achieved an A- (Leadership level) in CDP's Supplier Engagement Assessment for 2025, demonstrating the effectiveness of our ongoing engagement with suppliers on ESG performance and expectations.
- We improved payment practices for SMEs and non-SMEs by enhancing our payment discipline to support supplier resilience. During 2025, 81% of invoice value was paid on receipt once approved, up from 78% in 2024, and our average payment time reduced to 26 days from 28 days during the previous year. Please see page 99 [here](#) of our AFR 2025 for more details.

## 11. FOCUS AREAS IN 2026

The following measures will continue to strengthen our awareness of Modern Slavery risks and enhance the safeguards and continuous improvements in place across the Group during the year ahead:

- We will continue to undertake timely reviews of our policies and frameworks in accordance with their governance requirements.
- Facilitate ongoing communication with our stakeholders on material topics in the following ways:
  - In addition to our regular engagement with employees and contractors, we will continue to offer opportunities for employees and contractors to provide feedback, including through our AIB Engage survey,
  - Raise awareness of our Whistleblowing process, through communications and training, and
  - Provide customers and the wider community with channels to engage with us through our confidential complaint-management process.
- We intend to publish an updated Responsible Supplier Code on our website in 2026, which sets out the minimum standards we expect from our suppliers, and the key social, ethical and environmental values to abide by.

- We will continue to evolve our Modern Slavery Statement by further assessing how UK Government guidance released in March 2025 may be appropriately integrated into our statement, with reference to selected Level 2 elements.

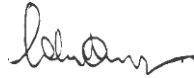
**Please click [here](#) to learn more about our broader approach to sustainability and our progress to date in our Sustainability Report section of our AFR 2025.**

This Statement is made in accordance with section 54(1) of the UK's Modern Slavery Act 2015. It sets out the steps taken by AIB Group plc during year ending 31 December 2025 to prevent modern slavery and human trafficking ("Modern Slavery") in our business and supply chain and its subsidiaries.

This statement is issued on behalf of the following AIB Group entities.

AIB Group plc  
Allied Irish Banks, p.l.c.  
AIB Group (UK) plc  
Goodbody Stockbrokers UC

Date of board approval: 26/03/2026



Name: Colin Hunt  
Position: Chief Executive Office

This Statement was approved for adoption by the Board of Goodbody Stockbrokers UC on 7 May 2026:



Name: Martin Tormey  
Position: Goodbody Chief Executive Officer