

Goodbody Stockbrokers Modern Slavery Statement

Financial Year End: 31st December 2022

This statement is made pursuant to sec 54(1) of the UK's Modern Slavery Act 2015 and sets out the steps taken by Goodbody Stockbrokers UC (Goodbody) during the year ending 31 December 2022 to prevent modern slavery and human trafficking in our business and supply chain.

Background

Under section 54 of the Act, commercial organisations that supply goods or services, carry on business in the UK and meet the annual turnover threshold of at least £36m from the provision of goods and services must publish an annual slavery and human trafficking statement. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Our Business

Goodbody, a member of the group of companies headed by AIB Group plc, is a leading financial services firm serving and growing client relationships for nearly 150 years. We are a full service, investment-led business offering wealth management, asset management and investment banking services with key operating jurisdictions of Ireland, UK and US. Deeply proud of our heritage and reputation, quality advice and exceptional client service is at the core of our client offering.

Because the Goodbody origins stem from principles of stewardship, integrity, and community by life-long entrepreneurs, it is in our DNA to create long-term prosperity. And we believe that long-term economic prosperity is increasingly interlinked with environmental and social risks and opportunities. That is why sustainability is a core pillar of our strategy and is implicit in our values.

Our values and guiding principles

Do the right thing	Make a difference	Be ambitious	Work as One
Being accountable, taking ownership, and always acting in the best interests of our clients, colleagues and broader stakeholders	Achieving sustainable growth for our clients, colleagues and broader stakeholders	We take personal accountability to drive growth and to continually deliver the best possible outcome for our clients	Harnessing our collective power by working in partnership to achieve more together than we can alone

Given the nature of the services we offer, we believe the risk of involvement in modern slavery and human trafficking is low.

Steps taken to ensure modern slavery is not taking place in our organisation or supply chains include the following:

We maintain robust recruitment and onboarding process with multiple checks built in to ensure all individuals employed by Goodbody are paid a fair salary in compliance with all relevant rules and regulations and are not subjected to human trafficking or forced labour.

Further, we maintain a reputation for conducting our business activities in the highest ethical and professional manner. All employees are expected to comply with Goodbody Code of Conduct and Ethics which sets out basic principles designed to guide our employees. All employees must conduct themselves in accordance with this

Code and seek to avoid even the appearance of improper behaviour. Our employees have a personal responsibility to immediately report illegal or unethical behaviour and appropriate processes are in place to allow them to easily do so.

Our Speak Up Policy clearly sets out how employees can safely and confidentially raise a concern about suspected or actual wrongdoing in work, without fear of penalisation. Our Grievance process also provides a mechanism for our employees who feel they have been mistreated or have been subject to behaviours they believe are contrary to our Code of Conduct to raise concerns. Additionally, we operate a comprehensive Complaints process designed to provide our customers with the opportunity to be heard and have concerns investigated.

Our suppliers are mainly professional services, business services, office space leasing to accommodate our people and business operations, facilities and waste management, and IT service providers. Goodbody considers that these services and facilities in general present a low risk of modern slavery and human trafficking and key suppliers are located in jurisdictions with a traditionally low risk of modern slavery such as Ireland, UK and US. Notwithstanding this low risk profile, Goodbody is taking action and is committed to ensuring that there is no modern slavery or human trafficking occurring in its supply chains or in any part of its business. Goodbody takes a zero-tolerance approach to modern slavery and human trafficking. Goodbody maintains policies and procedures which address the risk of slavery and human trafficking in our business and in its supply chains.

Goodbody will continue to review relevant policies and protocols and endeavour to enhance the steps being taken to prevent modern slavery and human trafficking in our business and supply chain, with the aim of delivering additional measures over the next financial year including:

- Adoption and embedding of our parent group (AIB) third party risk management policies and procedures.
- On-going enhancement of our governance and risk management frameworks.
- Training sessions throughout our organisation on Sustainability which includes modern slavery.

This Statement will be published on the Goodbody's website:

<https://www.goodbody.ie/legal-and-regulatory-disclosures/xxx.pdf>

This statement has been approved by the board of directors of Goodbody Stockbrokers UC and will be reviewed and amended where necessary.

Date of Board Approval: 30/06/2023



Name Martin Tormey
Position CEO and Executive Director
Goodbody Stockbrokers UC