



standard
chartered

Modern Slavery Statement 2021

- Supporting our clients,
colleagues and communities •
Here for good



Who we are

We are a leading international banking group, with a presence in 59 of the world's most dynamic markets. Our purpose is to drive commerce and prosperity through our unique diversity. Our businesses serve the following client segments in three regions, supported by nine global functions:

- Corporate, Commercial & Institutional Banking
- Consumer, Private & Business Banking

We achieve this via more than 81,000 employees and fixed-term workers¹, spread across our markets. A significant majority of those working for us are skilled professional workers.

¹ It includes:

- Non-outsourced non-employed workers (NEWs): resources engaged on a time and materials basis where task selection and supervision is the responsibility of the Bank, such as agency workers.
- Outsourced NEWs are arrangements with a third party vendor where the delivery is based on a specific service or outcome at an agreed price, irrespective of the number of resources required to perform the service. These resources are not considered as the Bank's headcount.

Our client segments



1.

Commercial, Corporate and Institutional Banking

Commercial, Corporate and Institutional Banking supports clients with their transaction banking, financial markets, corporate finance and borrowing needs across 50 markets, providing solutions to more than 5,000 clients in some of the world's fastest-growing economies and most active trade corridors.

Operating income

\$8,407m

Underlying basis

\$8,416m

Statutory basis

2.

Consumer, Private and Business Banking

Consumer, Private and Business Banking serves more than nine million individuals and small businesses, with a focus on affluent and emerging affluent in many of the world's fastest-growing cities.

Operating income

\$5,733m

Underlying basis

\$5,733m

Statutory basis

3. **Central & other items**

Operating income

\$573m

Underlying basis

\$552m

Statutory basis

Modern slavery

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This statement, issued in accordance with the UK's Modern Slavery Act 2015, sets out the steps we have taken during the financial year ending 31 December 2021 to seek to ensure that modern slavery, whether of an adult or child, is not taking place in our own operations or in our supply chains. It is made on behalf of Standard Chartered plc and each of its wholly owned direct and indirect subsidiaries (the "Group"). This includes, but is not limited to, the following legal entities: Standard Chartered Bank, Standard Chartered Holdings Limited and Standard Chartered plc.

For a full list of our Subsidiary Undertakings, please see the Notes to the Financial Statements in our 2021 Annual Report.

We spent around USD4.1 billion in 2021 with around 12,100 active suppliers². We source from the majority of markets in which we operate.

Most of our expenditure is indirect; goods and services that enable our core provision of financial services, rather than goods for resale. We have no inherent seasonality in our sourcing; either in variation of the goods and services we source or the suppliers from whom we source.

² Includes all suppliers that have received a payment in 2021. It does not include suppliers for markets not using e-procurement system (i.e. represent less than 1% of expenditure).

People



Colleagues

81,957



Non-employed workers

13,845

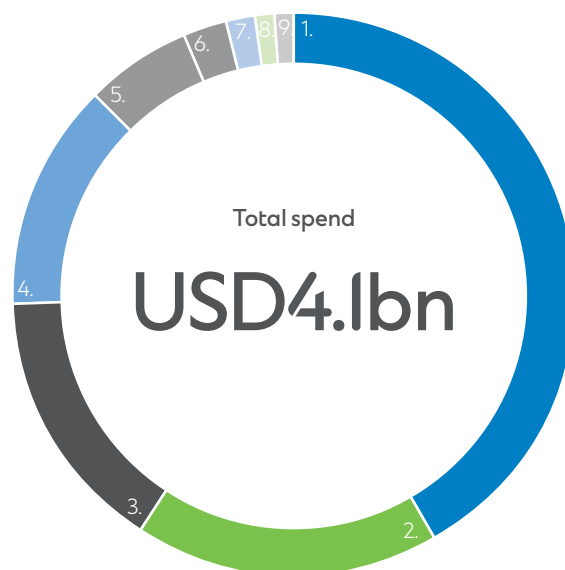


Active suppliers 2021

around 12,100

Our spend covers the following categories:

1.	Technology	41.9%
2.	Professional Services	17.5%
3.	Property	15.3%
4.	Marketing	12.8%
5.	HR	6.2%
6.	Banking Operations	2.6%
7.	Others	1.7%
8.	Travel	1.0%
9.	Office Supplies	1.0%



Our approach

Tackling MSHT

Through slavery, servitude, forced or compulsory labour and human trafficking, modern slavery and human trafficking (MSHT) breaches fundamental human rights. Our roles as an employer, procurer of goods and services and provider of financial services, each carry the risk of exposure to these practices. Our broad footprint and our capabilities, particularly in respect of fighting financial crime, gives us the opportunity to raise awareness of, and take steps to tackle, MSHT in a wide range of markets and industries.

We seek to ensure there is no MSHT in our operations and supply chain, and to identify and address MSHT risks connected to our provision of financial services. We recognise this is an ongoing process, as evidenced by our 2021 actions and 2022 commitments detailed under the 'Learning and improving' sections in this document.

Our Position Statement on Human Rights ([sc.com/humanrights](https://www.sc.com/humanrights)) was developed following engagement with a range of external stakeholders including expert practitioners and civil society organisations. It was first approved by our Group Chief Executive in May 2016 and is informed by a range of international standards including:

In 2021, we updated our Position Statement on Human Rights

- International Bill of Human Rights, comprising:
 - United Nations (UN) Universal Declaration of Human Rights
 - International Covenant on Civil and Political Rights
 - International Covenant on Economic, Social and Cultural Rights
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- International Labour Organisation Conventions 138 (Minimum Age) and 182 (Worst Forms of Child Labour)
- UN Guiding Principles on Business and Human Rights (the 'Ruggie Principles')
- UN Global Compact
- Thun Group of Banks – The Guiding Principles: an interpretation for banks
- International Finance Corporation (IFC) Performance Standards

after completing a consultation process with experts and stakeholders.

Our Group-wide Code of Conduct reflects our commitments on human rights, confirming that we respect human rights impacted by our activities with colleagues, suppliers and clients. Where adverse impacts occur, we are committed to addressing these.

All colleagues commit to, and undertake online training on, our Code upon joining Standard Chartered and recommit to it annually.

Standard Chartered's Speaking Up programme was established for use by internal and external parties to report any concerns about misconduct on the part of Standard Chartered employees, its suppliers and subcontractors. Third parties can report relevant information in confidence by using a secure web-based channel (www.intouchfeedback.com/speakingup). The website accepts reports in 13 languages. Reports may also be made anonymously and are investigated by Standard Chartered in strict confidence. The Speaking Up programme is overseen by senior management and all people leaders are required to complete training on the programme.

We communicate our Speaking Up programme to our suppliers through our Supplier Charter ([sc.com/suppliercharter](https://www.sc.com/suppliercharter)).

During 2021 no MSHT cases were brought to our attention through the Speaking Up programme.

Learning and improving

We recognise the importance of a joined-up approach to addressing MSHT across the organisation. In 2017 the MSHT Working Group (which later became our Human Rights Working Group) carried out a review of our salient MSHT risks and the controls we had in place to guard against negative impacts on people. This included an assessment of market-level MSHT risks in all the markets in which we operate, and how our role as an employer, procurer or financier may connect us to these risks. We detail in the following sections how in 2021 we continued to further our response to MSHT, guided by our own work and that of key external stakeholders.

The Human Rights Working Group reports to our Sustainability Forum, which, in turn, provides periodic updates to our Group Management Team, and the Culture and Sustainability Committee of the Board.

We also participate in informal discussions with other banks and stakeholders to share experiences, best practice and enhance our knowledge of MSHT controls and reporting.

Our approach continued

We recognise the financial services sector has a significant role to play in fighting MSHT. For example, we can contribute to the disruption of illicit financial flows by applying our anti-money laundering capabilities to identify and report financial activity connected to the unlawful business model of exploitation.

One of our objectives as a Bank is to support partnerships that fight financial crime (sc.com/fightingfinancialcrime). In recognition of the Group financial crime mission to “partner to lead in the fight against financial crime”, since 2014 we have worked to encourage a more coordinated industry approach to the role of financial institutions (FIs) in identifying and disrupting financial flows linked with MSHT.

Examples of this include our:

- Participation in the Joint Money Laundering Intelligence Taskforce (JMLIT) – the UK’s model for a collaborative approach to tackling money laundering, through a partnership between the UK government, law enforcement agencies and members of the financial sector. We chaired the JMLIT’s Expert Working Group (EWG) on Human Trafficking and Organised Immigration Crime (HT & OIC) for four years. We continue building stronger cross-sector partnerships and drive an improved understanding of how FIs can disrupt the illicit finances that underpin this criminal business.
- Promotion of knowledge exchange on types and indicators of MSHT between NGOs, public sector participants and FIs by:
 - Working closely with the Association of Certified Anti-Money Laundering Specialists (ACAMS), the European Union Anti-Money Laundering (EU AML) Trust Fund, the International Centre for Missing & Exploited Children (ICMEC), the Mekong Club and Polaris to develop good industry practice.
 - Participating in panel discussions worldwide on topics relating to MSHT, such as an industry webinar in Asia on the mobilisation of banks and FIs to combat Child Sexual Exploitation (CSE).
 - Leveraging the International Data Hub to Combat Human Trafficking as part of our normal business operations. We previously participated in an industry-wide pilot, coordinated by the NGO Stop The Traffik, to develop the tool.

“We recognise the importance of a joined-up approach to addressing MSHT across the organisation”

- Launch of ‘The Whole Story’ campaign, designed to raise awareness of the Bank’s efforts to tackle modern slavery. Reaching more than 80,000 colleagues worldwide, this campaign highlighted the Bank’s internal investigations and partnerships with external parties. In addition, all colleagues are required to complete annual training on external and internal financial crime risks. The external risks module covers suspicious activities related to modern slavery and steps taken by the Bank to combat modern slavery.
- Proactive assessment of MSHT-related risks arising from financial crime investigations across the Group’s network in recent years, as well as the launch of targeted investigations relating to specific MSHT risks.

Human Rights Working Group Reporting Lines



How we approach MSHT with clients

In addition to prohibiting relations with parties known or reasonably suspected to be involved in organised crime including human trafficking, our customer due diligence procedures include requirements to determine the nature of a client's business activities and source of funds/wealth, and media screening of our clients to identify any potential connections to criminality including human trafficking.

We have long-standing environmental and social standards in place for business clients ([sc.com/positionstatements](https://www.sc.com/positionstatements)). These set clear expectations requiring clients to have appropriate controls in place to prevent modern slavery practices.

“We have long-standing environmental and social standards in place for business clients”

Further, we embed these standards via our systems and practices. As an example, through our trade finance systems, we undertake automated screening of letter of credit trade financing, to identify where either the applicant or beneficiary of financing is operating in a high-risk market/commodity combination. This system uses information from IFC and World Wildlife Fund's Global Map of Environmental and Social Risks in AgroCommodity Production. A report is generated monthly to provide post-issuance transaction screening across all global markets for high-risk combinations. This helps support our client due diligence and consider whether they have reasonable controls in place to manage risks including modern slavery.

Where we identify, or others bring to our attention, that MSHT practices are or may be occurring, we will investigate and work with our clients to ensure they are able to stop these practices and prevent recurrence. Where we cannot get the necessary level of comfort that sufficient safeguards and remediation are in place, we will exit the client. Our relationship managers receive training via a variety of methods including face-to-face, webinar and online, to help them engage with clients. In 2021, we trained 1,280 colleagues on environmental and social risk management via virtual trainings.

Malaysian manufacturing sector

Due to the COVID-19 pandemic, there has been a sharp increase in demand for manufactured goods from Malaysia.

In 2020, allegations were made by local and international media about the market's poor labour and working conditions – including workers paying recruitment fees, working long hours and having their passports withheld – and in response, we asked manufacturing clients in Malaysia at heightened risk of MSHT:

- Policies and procedures around the prevention of forced labour and worker welfare.
- Regular audit information, including how effectively their grievance mechanisms are functioning, and whether they are picking up issues before they become material.
- Procedures relating to the provision of additional personal protective equipment, distancing on transport to factories and other COVID-19 safety measures for workers.

Where we identify clients to be non-compliant with our standards, we track their progress in remediation against relevant issues on a quarterly basis. In 2021, for example, we followed up from our previous engagement with a client to review their new policies developed for human rights and worker welfare. We also engaged with their senior management to receive updates on their grievance process which is being run by an external specialist labour and human rights consultancy.

How we approach MSHT with clients continued

Learning and improving

We continue to address a number of areas where we could enhance our response. These are identified through our own ongoing review and external engagement.

In 2021, we:

- Updated our environmental and social risk assessment process based on the findings of a human rights consultancy and required clients with heightened risk to undertake additional due diligence to seek to ensure they have appropriate systems to manage the risk.
- Established a human rights specialist consultancy database to assist in due diligence and corrective action plans for clients when human rights allegations have been flagged.
- Incorporated additional requirements into our environmental and social risk assessment process for client-level grievance mechanisms including guidance on how to establish an IFC-compliant process.
- Established guidance for clients on developing human rights policies and procedures.

During 2022, we will:

- Continue to be vigilant about identifying modern slavery infringements based on our classification of high-risk markets and sectors.
- Use Human Rights Impact Assessment processes on eligible project finance transactions where there is heightened risk of modern slavery.
- Continue to work with the Thun Group to develop human rights-related legal clauses for use with clients in high-risk categories.



³ Our review of MSHT risks and controls during 2017 identified areas for improvement

How we approach MSHT with suppliers

Standard Chartered does not knowingly participate in relationships with suppliers involved in MSHT. All suppliers are required to comply with our Supplier Charter (sc.com/suppliercharter) as part of registration, and to apply its principles within their sphere of influence, such as approved subcontractors. We reinforce this through the terms of our standard contract templates. Our Supplier Charter is shared with all suppliers on an annual basis and in 2021, it was revised to include a principle encouraging our suppliers to promote fair pay practices within their workforce, including the development of their own understanding of living wages.

The Charter includes expectations that suppliers:

- Work to support and respect the protection of human rights in accordance with the UN Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights.
- Prohibit human trafficking, the use of all forms of forced or compulsory labour and any other form of modern slavery within the supplier's own operations.
- Recognise and conform with the rights of colleagues to associate freely and to organise and bargain collectively in accordance within the framework of local laws in which they are employed, recognising the role of ILO Conventions 87 on freedom of association and 98 on right to organise and collective bargaining.
- Not use child labour and to support effective abolition of child labour, and to take all reasonable steps to eliminate such labour from their supply chain, recognising the role of ILO Conventions 138 on minimum age and 182 on child labour.
- Take all reasonable steps to eliminate forced labour from their supply chain, recognising the role of ILO Conventions 29 and 105 on forced labour.
- Promote fair pay practices with their workforce.

Before adding new vendors into our Procurement system, we screen them against potential modern slavery risks. Suppliers with heightened modern slavery risks are also assessed to ensure they have approaches in place to address modern slavery. Supplier categories with heightened modern slavery risks include office services and supplies, property, human resources, banking operations services, marketing and advertising services, technology hardware, telecoms and networks in specific identified countries. A supplier's response forms part of our overall evaluation criteria, informing our decision on whether to do business with them.

Our standard contracts contain rights to conduct routine monitoring of suppliers. Those found non-compliant with our standards may face termination of contracts and be excluded from potential engagement opportunities.

Since 2020, the risk management of modern slavery within our supply chain is aligned to the Reputational and Sustainability Risk Type Framework. Over the last two years, we have reviewed our processes, controls and frameworks to ensure we are effectively identifying, assessing and managing modern slavery risks, including wider topics such as health and safety, labour practices and fair wages.

Learning and improving

Building on our actions in previous years, we took further steps with the long-term objective of eradicating MSHT from our supply chains.

During 2021, we:

- Highlighted modern slavery potential risk at the vendor onboarding stage for all high-risk categories.
- Enhanced our procurement strategies for those buying categories where modern slavery risk is relevant.
- Increased the awareness and knowledge of third-party modern slavery risk among procurement colleagues and contract owners through trainings and internal communications.
- Updated our Supplier Charter, with changes including promotion of fair pay practices within our suppliers' workforces.

During 2022, we will:

- Re-assess the modern slavery risk of all procurement categories, using internal and external studies and benchmarks.
- Update the modern slavery controls in our procurement system and continue to identify and assess modern slavery risk through vendor screening and onboarding due diligence.
- As COVID-19 restrictions lift, we will increase the level of on-site auditing performed on vendors with potential high modern slavery risk.

How we approach MSHT with our workforce

Our workforce includes colleagues employed by Standard Chartered and non-employed workers who are contracted through third parties. We address MSHT with non-employed workers through measures taken with respect to our supply chain, as outlined above.

We maintain and assure policies and standards which set out how we engage with colleagues through hiring, throughout their career and upon leaving Standard Chartered, which include measures that seek to ensure no employee of Standard Chartered is a victim of MSHT practices through their employment.

Our Fair Pay Charter (sc.com/fairpaycharter) supports our commitment to deliver fair and competitive remuneration to all colleagues. The Charter sets out the principles we use to guide reward and performance decision-making globally, including commitments around how we set, structure and deliver remuneration.

We maintain compliance with living wages through our hiring and pay review processes. We are mindful that changes in economic conditions can rapidly increase the cost of goods and services. We therefore monitor changing conditions throughout the year to ensure that our commitment remains appropriate, and where required, we provide additional monetary interventions outside of our annual pay review cycle.

We have a grievance process in place to enable colleagues to raise concerns that relate to their employment or another colleague which affect them directly. We also have a disciplinary process underpinned by fair accountability principles to address conduct and behaviour which fails to meet expected standards.

Further information on our alignment to the Fair Pay Charter and on how we engage colleagues on fairness, can be found in our Fair Pay Report (sc.com/fairpaycharter).

“Our Fair Pay Charter supports our commitment to deliver fair and competitive remuneration to all colleagues”



Supporting shared action

% of employees committing to the Code of Conduct

99.9%

Number of transactions reviewed by our ESRM team

1,333

Standard Chartered acknowledges we cannot tackle MSHT on our own. Our actions detailed above show how we work with those we have a direct relationship with, and we also promote shared action through collaborative platforms. These include:

Organisation	Basis for partnering	Progress in 2021
Roundtable on Sustainable Palm Oil (RSPO)	Standard Chartered has been an active member of RSPO for many years as we believe that issues relating to modern slavery in the palm oil supply chain require multi-stakeholder approaches.	Standard Chartered continues to play an active role in RSPO and promoting awareness and remediation of MSHT issues within the palm oil supply chain.
Thun Group	The Thun Group is an informal group of banks who work together with the purpose of understanding how human rights can best be respected and promoted across the breadth of different banking activities. Standard Chartered has been a participant in the Thun Group since 2013.	We continue to actively contribute to the Thun Group's work; during 2021 we co-led a workstream assessing how market standard legal documentation for transactions might be amended to incorporate human rights considerations. We were also involved in the workstream to develop key performance indicators that could be used by FIs to monitor their progress in managing key human rights risks in clients.
NGOs and Civil Society	Our key partners in 2021 included ACAMS, the EU AML Trust Fund, ICMEC, the Mekong Club, Polaris and Stop the Traffik. The focus of our engagement with NGOs and other civil society stakeholders on MSHT has been to inform our financial crime fighting work; we also seek opportunities to inform our wider programme on MSHT. We are proud to work alongside several leading NGOs that help strengthen our understanding of the financial flows associated with MSHT, for example any geographic or sector specific characteristics. In turn, we encourage them to consider financial indicators in their analysis and reports.	Our work in 2021 included: • Working with the EU AML Trust Fund, including participating in the training of 41 law enforcement officers on enhancing financial investigative capacity in investigating human trafficking and smuggling of migrants. • Participating in the Hong Kong chapter of ACAMS' virtual seminar on how public-private partnerships can combat child exploitation within the financial services industry, attended by over 200 participants. The seminar was aimed at widening the discussion around child exploitation with industry and NGO partners for further collaboration. • Participating in the Traffik Analysis Hub, an initiative led by Stop the Traffik, which shares and develops MSHT typologies. • Launching 'The Whole Story' campaign to highlight the importance of financial crime compliance. This featured a live session on tackling and disrupting human trafficking between the Mekong Club, Stop the Traffik and our specialist Integrated Intelligence and Investigations team. • Holding a meeting with Polaris and FIs focusing on AML and human trafficking, specifically CSE. Four institutions presented case studies on how to trace the trafficker's and the victim's financial flow of funds. • Participating in a discussion hosted by ICMEC on the role of cryptocurrency in commercial CSE. The audience included representatives from law enforcement and the financial industry. ICMEC, in partnership with Standard Chartered, also published a report, "Cryptocurrency and the Trade of Online Child Sexual Abuse Material". This included a review of the latest global data and trends on usage of cryptocurrency in the trade of child sexual abuse material (CSAM) and case studies of law enforcement takedowns of websites relying on cryptocurrency for the trade of CSAM. • Engaging with an external vendor to undertake a pilot project analysing the retail banking data of four of our network countries in Asia, Africa and the Middle East to identify potential indicia of CSE.

Supporting shared action continued

Organisation	Basis for partnering	Progress in 2021
JMLIT	JMLIT is one of several financial crime-fighting financial information sharing partnerships in which we participate. JMLIT provides a framework for exchanging knowledge on key financial crime threats, including MSHT. It helps us enhance our effectiveness in combating financial crimes by improving our understanding of their financial characteristics. It also helps us play an active role in raising awareness among other FIs, law enforcement agencies and government bodies of the role that FIs can play in countering MSHT. JMLIT was described in 2018 by the Financial Action Task Force as “innovative” and an “example of best practice”. We participate in the JMLIT’s EWG on HT & OIC and, as such, play a leading role in bringing together representatives from the public and private sectors to build and share knowledge, and help the financial industry take more effective action against MSHT (sc.com/fightingfinancialcrime)	In our role as a member of the JMLIT EWG on HT & OIC, we have helped drive a collective industry response to MSHT, including taking the following steps: - We have continued to develop the Group’s forward work plan, aligning the intelligence needs of the public and private sector. - We continue to broaden awareness of the role of financial information sharing partnerships in combatting human trafficking. Actions to support this include training law enforcement in the UK and internationally, as well as with FIs in other markets. Additionally, in 2021 we: - Presented to the UK’s Metropolitan Police, HM Revenue and Customs and Border Force on the JMLIT and the role of the EWG in identifying and addressing MSHT risk. - Participated in the South African Anti-Money Laundering Integrated Task Force (SAMLIT) EWG on human trafficking and presented lessons learned from four years’ experience chairing the JMLIT EWG. We lead the SAMLIT group on how to generate intelligence, to more effectively understand how MSHT impacts the financial sector in South Africa. - Participated in a radio show in South Africa with the Secretary of SAMLIT to discuss the role of SAMLIT and EWG’s work on MSHT.
Sustainable Shipping Initiative	Standard Chartered was an advisor on the development of the Seafarers Charter with the Institute for Human Rights and Business which aims to eliminate all forms of forced labour and modern slavery in the shipping industry.	In 2021 we were actively involved in the launch of a Code of Conduct to protect the welfare and human rights of the world’s nearly two million seafarers. This included participating in a panel discussion to promote the Code’s launch and taking part in an ASN Media film for the International Maritime Organization. The film addressed the role of FIs in promoting sustainable shipping and the need to look beyond decarbonisation to seafarers’ rights. The film was shown during London’s International Shipping Week.

Supporting shared action continued

Completed eLearning on anti-money laundering

99.6%

The number of staff trained on ESRM

1,280

Measuring our progress

We measure how we perform against our standards in a few ways. This includes monitoring:

Measure	2021 Result	2020 Result	2019 Result
Completion of our mandatory eLearning on anti-money laundering, which contains materials on human trafficking	99.6% completion in 2021	99.9% completion in 2020	99.9% completion in 2019
Commitment to the Code of Conduct on an annual basis, and associated training where required	99.9% commitment and recommitment in 2021	99.8% commitment and recommitment in 2020	99.5% commitment and recommitment in 2019
The number of clients and transactions reviewed annually by our dedicated Environmental and Social Risk Management (ESRM) team, including predominant sectors and themes	1,333 clients and transactions reviewed in 2021. Predominant sectors included infrastructure and transportation, chemicals and manufacturing, fossil fuel power and renewables.	1,090 clients and transactions reviewed in 2020. Predominant sectors included chemicals and manufacturing, infrastructure and transportation, and oil and gas.	1,149 clients and transactions reviewed in 2019. Predominant sectors included chemicals and manufacturing, and infrastructure and transportation.
The number of colleagues trained annually on ESRM	1,280	1,604	1,126

It also includes documenting our practical experience, such as through the case studies in this document. We will continue to review these metrics and will introduce new metrics if we find better ways to monitor our progress in addressing modern slavery. We welcome feedback on our Modern Slavery Statement. Please contact us at sustainability.feedback@sc.com.

This Statement was approved by the Board of Directors of Standard Chartered plc on 15 February 2022.



Bill Winters
Group Chief Executive Officer

Footprint markets

Asia

Australia
Bangladesh
Brunei
Cambodia
India
Indonesia
Laos
Malaysia

Myanmar
Nepal
Philippines
Singapore
Sri Lanka
Thailand
Vietnam
Mainland China

Hong Kong
Japan
Macau
Korea
Taiwan

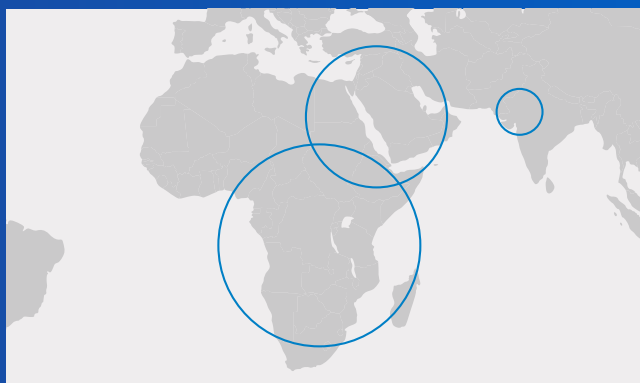


Africa & Middle East

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Egypt
Ghana
Iraq
Jordan

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Lebanon
Mauritius
Nigeria
Oman
Pakistan
Qatar
Saudi Arabia
Sierra Leone

South Africa
Tanzania
The Gambia
UAE
Uganda
Zambia
Zimbabwe



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▶ Let us know
what you think ◀

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