

Statement on Modern Slavery

June 2023

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 during year ending 31st December 2022 to prevent modern slavery and human trafficking ("Modern Slavery") in our business and supply chain and its subsidiaries.



INTRODUCTION

As Ireland's biggest bank, 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.

We recognise the responsibility that comes with the scale and impact of our business. We aspire to contribute and advocate for a fairer society that is socially and economically inclusive. We do this by investing and raising awareness in access, education and innovation for our customers, our colleagues and our communities.

This is AIB's 8th annual statement on Modern Slavery. All previous statements can be accessed on our website [here](#).

This year's statement demonstrates how we continue to use the opportunities that are available to us to mitigate against Human Rights breaches, not just in our Business, but in our Supply Chain.

Through our **Pledge to do More**, we are committed to building long-term resilience and sustainability for our business, economy, and our society.

“WE DO THIS BY INVESTING AND RAISING AWARENESS IN ACCESS, EDUCATION AND INNOVATION FOR OUR CUSTOMERS, OUR COLLEAGUES AND OUR COMMUNITIES.”



LEARN MORE BY READING OUR ANNUAL FINANCIAL RESULTS 2022

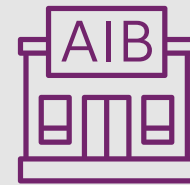


LEARN MORE BY READING OUR SUSTAINABILITY REPORT 2022

OUR BUSINESS

AIB Group operates predominantly in Ireland and the United Kingdom. Our shares are quoted on Euronext Dublin and the London Stock Exchange and we are a member of the FTSE4Good Index.

Our three core operating segments are Retail Banking, Capital Markets and AIB UK.



RETAIL BANKING

Supports our personal and business customers with a comprehensive range of banking and financial services, delivered through our branch and digital channels with an expanded reach via EBS, Haven, AIB Merchant Services, Payzone, Nifti and AIB life.



CAPITAL MARKETS

Serves AIB's large and medium-sized business customers as well as our private banking customers, providing deep sector expertise combined with our comprehensive product offering. In 2021, Goodbody became part of Capital Markets.



AIB UK

Operates in the two distinct markets of Great Britain and Northern Ireland. Across both regions, AIB supports our corporate customers with sector-specific expertise. In Northern Ireland, we offer full service retail banking.



OUR PURPOSE

Our purpose is to back our customers to achieve their dreams and ambitions.



OUR VALUES

Be one Team, Own the Outcome, Drive Progress, Show Respect, Eliminate Complexity.

OUR BUSINESS

2022 SUMMARY

OUR STRATEGY



CUSTOMER FIRST



SIMPLE & EFFICIENT



RISK & CAPITAL



TALENT & CULTURE



SUSTAINABLE COMMUNITIES

OVERVIEW

3.2m Active Customers

2.1m Digital Customers

9,590 Employees

4,000 Suppliers

170 Branches

FINANCIAL PERFORMANCE

€2,159m
Net Interest Income

€880m
Profit before tax

€59.6bn
Net Loans

ESG PERFORMANCE

€4.25bn
ESG bonds since 2020

€1bn
Social bond (first Irish bank)

€3.3bn
Green lending

€10.7m
Community Investments

GENDER & DIVERSITY

18.4% mean
(average) Gender Pay Gap (GPG)

1.39:1
(Ireland) Standard entry-level wage compared to local minimum wage

As a % of Management
42% Women
58% Men

HEALTH & SAFETY

0 Fatalities from work-related injury

14 Recordable work-related injuries

Source of Information:

AIB Group plc Financial Report for the Financial Year ended 31 December 2022. [AIB-Group-plc-AFR-dec-2022.pdf](#)

OUR BUSINESS



SUPPLY CHAIN

Our database of services is comprised of c.4000 suppliers. **In 2022 we transacted with 2,071 of these Suppliers, representing a spend of €1.1bn.**

There have been no significant changes to the location or structure of our supply chain in 2022.

As a regulated Financial Institution, we recognise that there is potential exposure to modern slavery within our supply chain. We take a risk-based approach to managing our suppliers.

Due diligence and risk assessments are carried out during the onboarding stage with all suppliers. We complete due diligence for supplier selection, prioritised according to the nature, value, complexity, and criticality of the service being procured.

For high value or high risk services, specific diligence checks are performed on the supplier and the proposed service model. Lower value/risk suppliers are subject to routine company financial and sanction scanning checks.

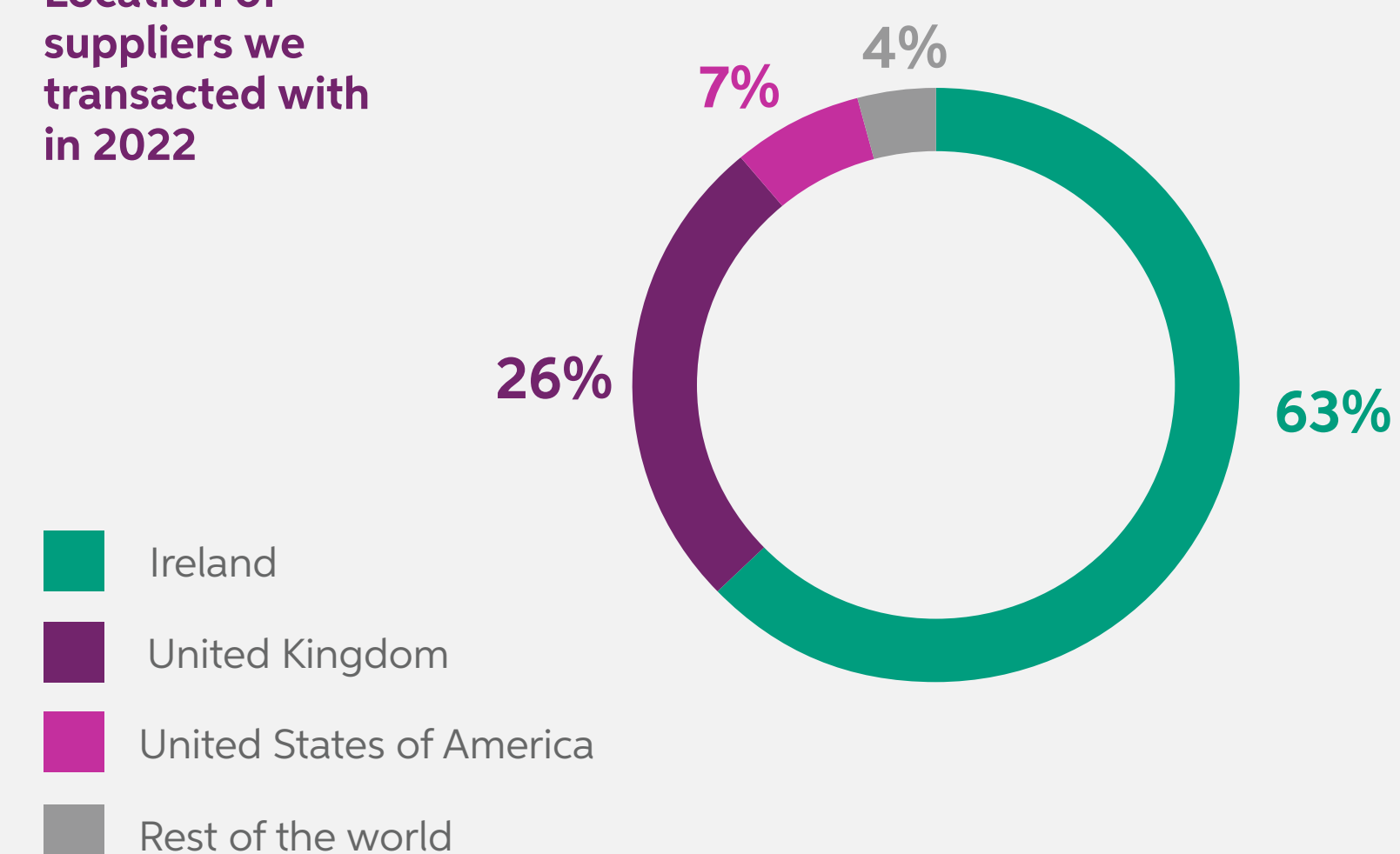


LEARN MORE BY READING OUR RESPONSIBLE SUPPLIER CODE

All suppliers must adhere to all legal obligations in each jurisdiction in which they operate or provide services (e.g. environmental and labour law) as well as any specific requirements included in AIBs policies as requested in the contract.

Our **Responsible Supplier Code** sets out the minimum standards we expect of our suppliers. The term 'Supplier' as used in the 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.

Location of suppliers we transacted with in 2022



OUR RISKS

As a Financial Institution, AIB is obliged to take a risk-based approach to customer due diligence (“CDD”) when assessing the underlying AML risk associated with each customer.

Our Business Customers are subject to a Financial Crime Risk Assessment. We conduct adverse media searches on the business accounts we open and on an ongoing basis to help identify any information which is in the public domain that may indicate modern slavery or breaches of employment law, such as breaking minimum wage requirement.

For our UK Business Customers, Modern Slavery is considered as part of our customer account opening process. We seek evidence of the customers Modern Slavery Statement, where they are required to produce one, in accordance with the UK Modern Slavery Act 2015. Secondly, through the Modern Slavery section of the business customer risk assessment, we consider the risks of Modern Slavery where it is identified that a business may employ a high proportion of low paid / seasonal / migrant workers, involved in sectors such as:

- Construction
- Catering
- Agriculture
- Recruitment agencies
- Sectors where the employer may not pay minimum wage

Suspicious Transactions Reports (STRs) play a pivotal role in the fight against money laundering and terrorist financing.

Information provided on STRs assist An Garda Síochána (the police) and the Revenue Commissioners (the authorities) in their investigations, resulting in the disruption of criminal and terrorist activities, and can ultimately result in prosecution and imprisonment.

STRs also provide authorities with valuable market intelligence on trends and typologies.

The requirement to report suspicious transactions is contained in section 42 of the Criminal Justice (Money Laundering and Terrorist Financing) Act, 2010 (CJA 2010).

Should we identify or have reason to believe a relationship presents the potential of modern slavery or the exploitation of low paid workers, the business would be rejected.

In Q1 2022, a **Financial Crime Bulletin** was shared to all ROI bank staff in which covered the topic of Forced Labour / Modern Slavery. The purpose of these bulletins is to raise awareness of specific topics and to set out what action staff should take where they have a suspicion of a financial crime occurring, as well as to refer staff to other training resources.

We publish an **Excluded Activities Policy**. The rules apply to all business customers with a Gross Connected Exposure of >£/€300k and who are relationship managed.



OUR RISKS

In 2022, we undertook an exercise to examine our supply chain of 4,000 suppliers, and engaged with Shift to establish a process of identifying Suppliers who may pose a higher risk of enabling Modern Slavery.

The examination exercise showed that overall we have a low risk of modern slavery within our greater supply chain, with only 40 suppliers (c. 1%) that potentially represent a higher risk of modern slavery by virtue of the type of industry in which they operate, and / or jurisdiction from where the service is being operated.

As a result, we have commenced enhanced due diligence on these suppliers to enable us to determine whether they represent an actual high risk and if any further action will be required.

“MODERN SLAVERY IS TYPICALLY FOUND IN LOWER SKILLED SERVICES AND SECTORS SUCH AS AGRICULTURE, CONSTRUCTION, HOSPITALITY, CAR WASH SERVICES, RETAIL AND MANUFACTURING.”

THE TYPES OF RISKS IN OUR SUPPLY CHAIN

According to the [UK National Crime Agency](#), Modern Slavery is typically found in lower skilled services and sectors such as Agriculture, Construction, Hospitality, Car wash services, Retail and Manufacturing.

In AIB the types of services identified within our Supply Chain that may be higher risk include services such as:



Events Management



Archive Storage



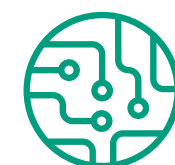
Facilities Management



Transport & Logistics



Recruitment



Hardware

Shift

Shift is the leading centre of expertise on the UN Guiding Principles on Business and Human Rights, which are the authoritative global standard on business and human rights, unanimously endorsed by the UN Human Rights Council in 2011. The 31 principles set expectations of states and companies about how to prevent and address negative impacts on human rights by business.

The Guiding Principles are at the heart of who SHIFT are, and at the core of everything they do. SHIFT played an instrumental role in writing them, and are internationally renowned as the leading centre of expertise on putting them into practice.

OUR CULTURE

Our purpose, values and our people are the cornerstones on which our culture is built. Empowering our leaders and encouraging them to live our organisation's values and associated behaviours is key to evolving our culture.



BE ONE TEAM



OWN THE OUTCOME



DRIVE PROGRESS



SHOW RESPECT



ELIMINATE COMPLEXITY

CONTINUING OUR CULTURE JOURNEY IN 2022

In 2022 we continued our culture journey, to embed our 5 values, through a series of culture led initiatives. One of the key ways we embed our values is through our people leader development programme LEAD (Leaders Enabling a Difference) with specific modules on living our values.

AIB has an active Speak your Mind programme with a dedicated Speak your Mind week to showcase the importance of speaking up and psychological safety. We launched a new approach to employee engagement - 'AIB engage', and continued focus on colleagues wellbeing. We also launched a series of events for colleagues with Long Service, hosting a number of Long Service Recognition dinners, to recognise the importance of our colleagues with long service.

AIB EMPLOYEE VALUE AWARDS

Following the development of our new values and behaviours, we launched the Employee Value Awards in 2021, to recognise the way in which our colleagues have embraced and live our values in their everyday interactions with one another, our customers and the communities in which we operate.

In 2022 we added a special recognition category for colleagues that supported customers through the pandemic, with over 2,200 colleagues nominated (1/4 of our employees) and almost 20,000 votes cast to select the worthy winners.



OUR CULTURE

Inclusion and diversity (I&D) are at the heart of our culture at AIB. Embracing difference and embedding diversity and working to ensure universal inclusion across our organisation helps us to be the best that we can be in our thinking, our decisions and our outcomes. It is fundamental to our aim to be a successful organisation that our people, and our customers, can believe in.

INCLUSION & DIVERSITY - A KEY STRATEGIC PRIORITY

Our focus on diversity takes gender, race, family status and other traditional diversity areas into account but also adopts a contemporary view of diversity, including life experiences, thinking styles, etc. Encompassing external commitments and internal actions, our efforts are concentrated on fostering sustainable Inclusion & Diversity from the classroom to the boardroom, addressing important talent opportunities such as recruitment, participation, pay, promotions and retention.

Recruitment and selection policies are designed to ensure that there is no bias, either in favour of, or against, any applicant. Our Inclusion and Diversity Code sets out the principles we live by and underpins new policies and handbooks introduced on Domestic Violence & Abuse, Menopause and Family Leave, and a year-round

employee engagement calendar of diversity awareness and educational events. Our I&D code complies with legislative and regulatory requirements in all the jurisdictions in which we operate. This includes the International Labour Organization (ILO) C111 - Discrimination (Employment and Occupation) Convention.



Gold accreditation
from Irish Centre
for Diversity



OUR POLICIES



Our **Code of Conduct** is a core framework that underpins our values and culture. It sets out clear expectations for how we behave and how we do business.

Our personal responsibilities to abide by the Code are explicitly called out, as are the responsibilities expected of all People Leaders to support and embed it.

It is supported by policies including Conflicts of Interests, Financial Crime (including Anti-Bribery & Corruption), Conduct of Personal Financial and Tax Affairs, Social Media, Inclusion & Diversity and Speak-Up.

In reference to **Human Rights and Slavery**, our Code of Conduct reads:

“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 WE BECOME AWARE OF WHERE THIS HAS OCCURRED.”

Our Code of Conduct contains five core conduct standards that are reflective of those set out by our regulators in the jurisdictions in which we operate. The updated code contains a guiding framework to help staff to make better decisions.

All employees are required to adhere to our Code of Conduct and are required to complete a declaration of compliance with our Code as part of the annual ASPIRE Performance Management Process. Failure to comply with our Code is taken seriously and may lead to disciplinary action up to and including dismissal, or in the case of contract staff or suppliers, cancellation of contract.



LEARN MORE BY READING OUR RESPONSIBLE SUPPLIER CODE



LEARN MORE BY READING OUR CODE OF CONDUCT



LEARN MORE BY READING OUR CONFLICTS OF INTERESTS POLICY



LEARN MORE BY READING OUR AIB EXCLUDED ACTIVITIES POLICY

OUR POLICIES

Annual training on the Code - delivered through I-Learn, our e-learning tool - is mandatory for all employees, and completion is recorded, monitored and tested by local business teams with central oversight from Human Resources.

The Chief Executive Officer is the policy sponsor of the Code. It is reviewed annually by our Group Conduct Committee and the Board Audit Committee. An annual Code of Conduct activities report is presented to the Board Audit Committee covering a number of key topics.

In line with our [Responsible Supplier Code](#), we don't partner with or buy from organisations which we know to breach human rights or fair practices. We report annually on our approaches to tackling modern slavery in our Modern Slavery Statement.

The intent of the code extends to our supply chain, and in the past year our critical outsourcing suppliers attested to compliance with the Code of Conduct along with 17 other relevant [AIB policies](#).

On our Sustainability Website, we host some more of our key policies and codes such as; [Our Remuneration Policy](#) and [Our Recruitment Policy](#).

“WE DON'T PARTNER WITH OR BUY FROM ORGANISATIONS WHICH WE KNOW TO BREACH HUMAN RIGHTS OR FAIR PRACTICES.”

SUMMARY

OUR CODE OF CONDUCT

Sets out clear expectations for how we behave and how we do business. The code guides our behaviours and emphasises our commitment to acting ethically, honestly and with integrity while demonstrating trustworthiness. It applies to anyone working in AIB. All employees are required to adhere to our code and complete a declaration of compliance with our code as part of their annual performance review. Annual e-learning on the code is mandatory for all employees. Our code was approved by our Board Audit Committee. It is publicly available at www.aib.ie/sustainability

OUR SOCIAL HOUSING POLICY

Together with our Commercial Investment Policy, supports lending to our customers for social housing and helps us to manage and mitigate the associated risks. Our policy was approved by our Group Credit Committee.

OUR INCLUSION & DIVERSITY CODE

Based on an ethos that respecting, developing and harnessing the talents of all our employees creates an inclusive and supportive organisation. It enables the Group to deliver a superior experience for all our customers, provides an inclusive place to work for our employees, and brings an appropriate financial return for our shareholders and the economies within which we operate. Our code was approved by our Executive Committee. It is publicly available at www.aib.ie/sustainability

OUR HEALTH & SAFETY POLICY

Sets out our commitment to ensuring the safety of our employees, customers, contractors, visitors and our workplace. Our policy was endorsed by our Chief Executive Officer. It is publicly available at www.aib.ie/sustainability

RAISING CONCERNS

All those working in or for AIB (including staff, contractors and third parties) have a responsibility and are encouraged to Speak Up and to raise concerns of wrongdoing or suspected wrongdoing in work.

AIB is committed to complying with our legal and regulatory obligations and all staff have a personal responsibility to champion the behaviours outlined in the Bank's Code of Conduct. Staff also have a responsibility to escalate concerns regarding

breaches of the Code or suspected or actual wrong doing initially through their People Leader or if they are not comfortable, through the Speak Up channels. Speak Up is a core supporting pillar of the Code of Conduct to ensure that wrong doing is detected and addressed quickly to protect the Bank's customers, staff and business. All reports of wrong doing will be taken seriously, treated confidentially and investigated with the utmost professionalism.

OUR SPEAK UP POLICY

Sets out how all those working for AIB Group, including but not limited to, employees, agency staff, tied agents, suppliers, contractors, consultants, and those providing an outsourced service, can safely and confidentially speak up to raise a concern about suspected or actual wrongdoing in work, without fear of penalisation.

During 2022, we enhanced our Speak Up process as follows:

We updated our Speak Up Policy to reflect changes required by the Protected Disclosure (Amendment) Act 2022. We ran our second Speak Your Mind awareness campaign to encourage our staff, contractors, and third parties to 'Speak their Minds' by voicing of opinions, concerns and ideas, with psychological safety at the core.



Other mechanisms for raising concerns include:



Our **Grievance process** is 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.



Complaints – we operate a comprehensive complaints process designed to provide our customers with the opportunity to be heard, have concerns investigated, and make good where needed.



[CLICK HERE TO READ MORE ABOUT OUR SPEAK UP POLICY](#)

OUR TRAINING

We have a dedicated suite for e-learning named **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. Such courses are mandatory for all AIB staff, contractors, and consultants within the AIB Group.

Annual training on the **Code Of Conduct**, delivered through **I-Learn**, is mandatory for all employees, and completion is recorded, monitored, and tested by local business teams with central oversight from HR. In 2022, 95% of our employees completed Code of Conduct training.

All staff are required to complete mandatory annual training in **Financial Crime**, which incorporates AML, CTF, and Sanctions. In 2022 AML and Terrorist Financing training was completed by 96% of employees.

An information mail on **Conflicts of Interest** is issued at least once annually to all employees. All employees are required to complete this annual mandatory e-learning course, which also includes anti-bribery & corruption matters. In 2022, 98% of employees completed Conflicts of Interest training.

It is important that all employees are aware of our **Speak-Up** process. They are required to complete the annual mandatory online training module on Speak-Up. This training module explains how the Speak Up Policy works, the channels available to report concerns of wrongdoing and the protection and support provided for raising such concerns. In 2022, 95% of staff completed Speak Up training.

Two major Learning & Development initiatives were introduced in 2022 to significantly enhance awareness and understanding of the benefits of **Inclusion & Diversity** for colleagues, customers and sustainable communities. The first was a new web-based mandatory foundational training module, and the second initiative was to train people leaders on Inclusive Leadership. This was implemented as part of the AIB's **LEAD** programme for all leaders in the business.

The new web-based mandatory foundational training module on I&D was completed by 13,512 (91.3%) of AIB leaders, staff and contractors. The Inclusive Leadership module in LEAD was completed by 2,575 people leaders in 2022, representing approximately 92% of all people leaders in AIB.

Sustainability training is mandatory for all employees, and is focused on ensuring an understanding of sustainability and its importance for business and for AIB. In 2022, 97% of employees completed sustainability training.

Owners of third party relationships to the bank must attend **Supplier Relationship Management (SRM)** training. This training is designed to equip the business with the knowledge and understanding required to manage their third party relationships, ensuring an appropriate level of risk management and ongoing oversight is maintained. To date, 84% of applicable employees have attended SRM training.

“THE NEW WEB-BASED MANDATORY FOUNDATIONAL TRAINING MODULE ON I&D WAS COMPLETED BY 13,512 (91.3%) OF AIB LEADERS, STAFF AND CONTRACTORS.”



HUMAN RIGHTS

Our Human Rights Commitment outlines how we respect human rights in accordance with internationally accepted standards. Our commitment to human rights is being embedded in the culture and values that define our company, and is reflected in our policies and actions toward our customers, employees, suppliers, and the communities and countries where we do business. It has been shaped by the United Nations Guiding Principles on Business and Human Rights.

Our Human Rights Commitment operates alongside AIB's Code of Conduct and AIB's Responsible Supplier Code, and our commitments are aligned with those laid out in the laws applicable to the jurisdictions in which we operate, the [European Convention on Human Rights](#) and for our business in Ireland the EU Charter of Fundamental Rights. Within the document we detail our Human rights commitment under headings including; Our Principles, Our Suppliers, and Due Diligence in Human Rights. It was approved by our Executive Committee and reviewed by our Sustainability Business Advisory Committee and Board in February 2021.

In 2022 we broadened the parameters of our human rights due diligence pilot to cover Retail Banking, HR and Risk alongside Corporate Lending and Procurement, recognising our responsibilities as an employer, procurer and provider of banking services.

The project delivered on two key objectives which have been reported to our Board's Sustainable Business Advisory Committee:

1. Built internal awareness on human rights as an issue for the business
2. Identified potential 'salient' human rights impacts relevant to the bank for action including modern slavery in the global value chain.

The large numbers of entities in our value chain and their corresponding global supply chains makes it challenging to conduct due diligence for adverse human rights impacts across all of them. As such, we identified general areas where the risk of adverse human rights impacts is most serious, systemic and there is an increased likelihood of it arising in

the short or long term, whether due to certain suppliers' operating context, business relationships, the particular products or services involved. We prioritized these 'salient' human rights impacts for further due diligence and action. We are currently updating our training modules, policies and procedures to enhance our human rights processes. Our UN Human Rights Global Compact Communication on Progress was published in March 2022.



**LEARN MORE BY READING OUR
UN GLOBAL COMPACT COMMUNICATION**



**LEARN MORE BY READING OUR
HUMAN RIGHTS COMMITMENT**



SUMMARY AND LOOKING AHEAD

WHAT WE DID IN 2022

STATEMENT HIGHLIGHTS

- ✓ Broadened our human rights due diligence across Corporate and Retail Banking, HR, Risk and Procurement to identify potential 'salient' human rights impacts relevant to the Group for action.
- ✓ In conjunction with Shift, a leading centre of excellence on the UN Guiding Principles, we conducted a full review of all suppliers to identify those most at risk of enabling Modern Slavery.
- ✓ Updated our Speak Up Policy to reflect new Protected Disclosures legislation.
- ✓ Aligned our Modern Slavery Statement to the UK Registry.
- ✓ Implemented our new ESG Framework.

ENVIRONMENTAL, **SOCIAL**, GOVERNANCE

- ✓ Raised €1bn in the first social bond issuance by an Irish bank.
- ✓ Supported social housing by providing funding of €91m in 2022, representing c. 570 homes.
- ✓ Supported 70 local charities in Ireland and the UK through the AIB Community €1 Million Fund.
- ✓ Contributed €500k to the Ukraine Emergency Appeal.
- ✓ Three-year partnership with AsIAm, Ireland's national autism charity.

SUPPORT OF ORGANISATIONS & COMMUNITIES

145 GOAL MILES

Communities across Ireland came together to **raise €420k** as part of the 2022 GOAL Mile, proudly supported by AIB. **Over 145 GOAL Miles took place across Ireland with 25,000 participants** in total, resulting in the highest number of GOAL Miles in Ireland to date.



RESPONDING TO CRISIS

AIB Group committed **€500k for the Ukraine Emergency Appeal; €250k to GOAL for urgent**, on-the-ground humanitarian aid and **€250k to the Irish Refugee Council**. In February, AIB employees donated over **€91k through our Payzone platform** which was doubled through AIB Matched Funding.

€1 MILLION FOR 70 CAUSES

AIB Community €1 Million Fund, **supporting 70 charities in Ireland and the UK**. We asked our customers, the public and our employees to nominate charities that matter most to them in their communities. You can see the full list of charities supported by the Fund at aib.ie/community.

SUMMARY AND LOOKING AHEAD

WHAT WE WILL DO IN 2023 AND BEYOND



Continue to enhance and refine our Financial Crime Controls, and partner with external stakeholders to prevent, detect, report and disrupt human trafficking and modern slavery.



Embed identified AIB salient human rights into relevant processes and continue to roll out training specific to Modern Slavery, that commenced in Q1 2023.



Continue to align supplier lifecycle to our ESG strategy. Our ambition is to:

- Use ESG to enhance our supplier lifecycle process
- Implement group aligned KPI's
- Monitor Supplier ESG compliance

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 31st December 2022 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

Date of board approval:

29/06/2023



Name: Colin Hunt

Position: Chief Executive Officer

CONTACT US

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