

Sumitomo Mitsui Banking Corporation  
Europe Limited

Slavery and Human Trafficking  
Statement

Financial year ending  
31 March 2018

## **Background**

The Modern Slavery Act 2015 (the “Act”) of the United Kingdom requires certain businesses to provide disclosure concerning their efforts to address the issues of Slavery and Human Trafficking in their supply chain. The disclosure is intended to assist customers to make better, more informed choices about the products and services they buy and the companies they support. This document comprises the Slavery and Human Trafficking Statement of Sumitomo Mitsui Banking Corporation Europe Limited (SMBCE) for the financial year ending 31 March 2018.

### **SMBCE’s business**

SMBCE is a bank authorised by the Prudential Regulation Authority (PRA) and regulated by the Financial Conduct Authority (FCA) and the PRA, and is incorporated in England and Wales. SMBCE is a wholly-owned subsidiary of Sumitomo Mitsui Banking Corporation (SMBC), which is a Japanese banking institution. SMBC is in turn a wholly-owned subsidiary of Sumitomo Mitsui Financial Group, a financial services conglomerate that is also incorporated in Japan.

SMBCE has a permanent presence in the following jurisdictions:

- Czech Republic
- France
- Ireland
- Italy
- Spain
- The Netherlands
- United Kingdom

Further information on SMBCE’s business can be found in our annual report and financial statements, which can be accessed at:

<https://www.smbcgroup.com/emea/home/>

### **SMBCE's stance on Slavery and Human Trafficking**

SMBCE continues its commitment to maintaining and improving systems and processes to mitigate the risk that it might be involved, wittingly or unwittingly, in the commission of Slavery and Human Trafficking in any part of its operations, supply chain (including customers, contractors and suppliers), products, services and staff activities.

SMBCE also expects its staff, suppliers and business partners to adhere to the same high standards and to take reasonable steps to ensure that other third parties they do business with adhere to those standards as well.

## **Governance**

Appropriate Anti-Slavery and Human Trafficking Policy and Procedures have been introduced within SMBCE. These provide detailed guidance to SMBCE staff on what constitutes an offence and the controls in place to mitigate the risk that SMBCE may be directly or indirectly involved in the commission of Slavery and Human Trafficking.

## **Supply Chain**

SMBCE takes appropriate steps to verify, evaluate and mitigate the risk that Slavery and Human Trafficking may occur in its supply chain. In particular, SMBCE performs due diligence on suppliers and contractors at the start of a business relationship and subsequently on a periodic basis. This due diligence process includes, but is not limited to, an analysis of the activity carried out by the suppliers and contractors and a detailed review of publicly available information, in order to identify instances that may give SMBCE cause for concern.

## **Customers**

SMBCE takes appropriate steps to identify, evaluate, and mitigate the risk that its products and services may be used by a customer for the commission of Slavery and Human Trafficking.

SMBCE conducts a series of checks on its customers, including, but not limited to, an analysis of the activity carried out by the customers and a detailed review of publicly available information, in order to identify instances that may give SMBCE cause for concern in relation to Slavery and Human Trafficking. As part of its on-boarding and periodic customer due diligence processes, all customers are assessed to determine if they fall within the scope of the Act, and, if so, a copy of their Anti-Slavery Statement is sought and retained. Furthermore, in relation to trade finance, all transactions are subject to checks to ascertain that the goods and country of origin are not prohibited under the SMBCE Anti-Slavery and Human Trafficking Policy.

## **Staff**

In order to ensure proper understanding of the risks posed by Slavery and Human Trafficking in the context of SMBCE's supply chains and business, SMBCE staff receive training on Slavery and Human Trafficking and the requirements of the Act. Members of staff are encouraged to report any instances of suspected Slavery and Human Trafficking identified in any part of SMBCE's business activities, either through their standard reporting line, or through SMBCE's whistleblowing programme.

## **Slavery and Human Trafficking**

As used in this Statement, the above term refers to a variety of offences, including but not limited to:

- Slavery, servitude and forced or compulsory labour;
- Sexual exploitation, including all offences contemplated in the Part 1 of the UK Sexual Offences Act 2003;
- Removal and trafficking of organs outside the context of authorised health treatments;
- Securing services or other type of benefits by force, threats or deception; and
- Securing services or other type of benefits from children and vulnerable persons.

## **Contact**

Questions, comments and requests regarding this Statement are welcomed and should be addressed to [SMBCEMSA@gb.smbcgroup.com](mailto:SMBCEMSA@gb.smbcgroup.com)

## **Approval**

This Statement was approved by the SMBCE Board of Directors and has been signed on behalf of the Board by Mr Mr Tetsuro Imaeda, Chief Executive Officer.

**Tetsuro Imaeda**  
**July 2018**