

Slavery and Human Trafficking Statement

Financial year ending 31 March 2019

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 2019.

SMBCE's structure and business

SMBCE is a commercial 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 (SMFG), a financial services conglomerate that is also incorporated in Japan.

SMBCE has a permanent presence in the United Kingdom and France, and carries out the majority of its activities in Europe, the Middle East and Africa. SMBCE offers a wide range of wholesale banking products, including: bilateral loans, guarantees, syndicated loans, project finance, aircraft finance, shipping finance, other specialised structured finance, trade finance, leveraged finance, cash management, money markets, foreign exchange, deposit taking, derivatives and other capital markets instruments.

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>.

SMBCE's stance on Slavery and Human Trafficking

As part of SMFG, SMBCE adheres to the group commitments to Corporate Social Responsibility (CSR), and the SMFG Statement on Human Rights, which reiterates the ethical responsibility to help protect and promote human rights.

The main principle guiding SMBCE's approach to Slavery and Human Trafficking is that it should not be involved, directly or indirectly, in the commission or facilitation of the offences specified by the Act.

SMBCE demonstrates an ongoing 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 and Due Diligence

SMBCE has established an Anti-Slavery Policy, which sets out the processes through which it seeks reasonable assurance that none of its customers, business partners, suppliers and other third parties are involved in the commission or facilitation of Slavery and/or Human Trafficking.

The Anti-Slavery Policy is supplemented by procedures and 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.

SMBCE has enhanced its due diligence measures for Slavery and Human Trafficking, whereby suppliers, contractors, customers and any other business partners are all subject to the same level of identification, verification and risk evaluation.

As part of its on-boarding and periodic due diligence processes, all suppliers, contractors, customers and business partners 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. By way of best practice, for those counterparties who are not in scope of the Act, SMBCE will seek to obtain an equivalent policy or document relating to their CSR, Human Rights etc.

Supply Chain and Customers

SMBCE takes appropriate steps to mitigate the risk that Slavery and Human Trafficking may occur in its supply chain, or that its products and services may be used by a customer for the commission of Slavery and Human Trafficking. This due diligence process includes, but is not limited to;

- Identification and verification;
- Determination of where the suppliers, contractors, customers and business partners are based and operate;
- Analysis of the activity carried out by the suppliers, contractors, customers and business partners; and
- Detailed review of publicly available information, in order to identify instances related to Slavery and Human Trafficking offences that may give SMBCE cause for concern.

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 Anti-Slavery Policy. Any instances where the customer may be involved in the commission or facilitation of the relevant offences due to its core activities, line of business, business relationships and/or country of establishment and/or operations will require more detailed investigation and approval by an appropriate person.

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 provides training to staff 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. The options for raising concerns and reporting are incorporated within SMBCE's Speak Up framework, including internal reporting lines, and SMBCE's whistleblowing programme.

It is equally important for SMBCE to demonstrate that no relevant offences are committed within its premises and/or in relation to its own employees. Human Resources have the responsibility to demonstrate, through the introduction of appropriate controls, that SMBCE's own employees are being treated in line with local laws and regulations, and are not victim of any of the relevant offences as a result of their employment.

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.

Approval

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

Tetsuro Imaeda

July 2019