

Sojitz Europe Plc Slavery and Human Trafficking Statement ("the Statement")

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps we have taken during the financial year 2018/2019 to ensure that slavery and human trafficking is not taking place in any part of the business or the supply chains.

This Statement has been approved by the Board of Directors and signed by Satoru Takahama, Managing Director.

Organisational Structure

Sojitz Europe Plc is a general trading company headquartered in London, UK. We are engaged in importing and exporting goods and services as well as planning and coordinating projects in the UK and overseas. We are a wholly owned subsidiary of Sojitz Corporation, incorporated in Japan.

We represent the Europe, Russia and NIS region and have offices in the Czech Republic, France, Germany, Hungary, Italy, Poland, Russia, Spain, Turkey and Ukraine ("the Region").

Our business is currently organised into 8 business divisions: automotive, infrastructure and environment, aerospace and IT, metal and coal, energy, chemical, foods and agriculture and lifestyle commodities and materials.

We have an annual turnover in excess of £36million.

Our principles

Our Code of Conduct and Ethics ("the Code") sets forth the fundamental principles based on both national and international standards to ensure our employees are upholding the highest level of ethical conduct in their day-to-day business.

We carry out Corporate Social Responsibility ("CSR") activities in line with the Code as well as the following Group policies:

- Sojitz Environmental Policy (this was updated in May 2018)
- Sojitz Group CSR Action Guidelines for Supply Chains ("CSR Guidelines")
- Anti-Corruption Rules
- Wood Procurement Policy
- Sojitz Group Human Rights Policy

In addition, taking into consideration the requirements of General Data Protection Regulations and the protection of individual rights, Sojitz Europe Plc has adopted a new Data Protection Policy in May 2018.

Supply Chain

Our supply chains include producers of raw material, manufacturers, distributors and agents located globally and across all business divisions.

Working with Sojitz Group companies and our supply chains to reduce environmental and social (human rights) risks has been an important issue for Sojitz Group.

In an effort to further the Sojitz Group CSR commitment, clearer action plans based on some CSR Focus Areas have been established in the form of Sojitz Group Supply Chain CSR Handbook (“CSR Handbook”).

The CSR Handbook is available on the Group company website:
https://www.sojitz.com/en/csr/supply/pdf/handbook_e.pdf

The CSR Handbook, provided mainly to Group companies and suppliers overseas, shares Sojitz’ environmental and human rights policies, basic explanations of CSR, and concrete, real examples of environmental and social risks in business and how these risks were addressed. The CSR Handbook was designed to teach Sojitz Group members the environmental impact of business activities as well as deepening the understanding of human rights and its importance in business.

Our Due Diligence Screening

As part of Sojitz’ Know Your Customer due diligence process, we have continued to subscribe to a database which provides wide-ranging information on organisations, including details of financial crime, bribery, corruption, human rights crimes and environmental crime convictions. The information is used for our decision-making process.

Effective Management of Slavery and Human Trafficking

The Human Rights Policy continues to be available on the Group company website:
<https://www.sojitz.com/en/csr/humanrights/>

Training on Human Rights

In March and April 2019, all employees in the Region were required to take e-learning training on the subject of Sojitz Group Code of Conduct and Ethics. This incorporated guidance on the importance of respecting human rights and required employees demonstrate that they had a clear understanding of the principles by passing a formal test

Positive Working Environment Memorandum

A Positive Working Environment Memorandum was circulated in 2018 to reiterate the company's stance on maintaining a positive work environment, respectful of human rights and privacy.

Updates continue to be considered in the company procedures, rules and regulations.

A handwritten signature in blue ink, appearing to read 'S. Takahama', written over a dotted line.

Satoru Takahama,
Managing Director of Sojitz Europe plc

19 July 2019