

TOYOTA TSUSHO METALS LIMITED

88 Wood Street, London EC2V 7DA

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Dealing Desk: 020 7367 7080

Back Office: 020 7776 3310

General: 020 7776 3100

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INTRODUCTION FROM THE SENIOR EXECUTIVE OFFICER

As a business, Toyota Tsusho Metals Limited (“TTM”) maintains a relationship with different organisations in its supply chain. We are committed to improving our practices to combat slavery and human trafficking. We all have a responsibility to be alert to the risks, however small in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them. This statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

ORGANISATION'S STRUCTURE

We specialise in futures and options trading in the non-ferrous metals market and precious metals market. We are a wholly owned subsidiary of Toyota Tsusho Corporation located in Nagoya, Japan. The Group has a global annual turnover in excess of £36m.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

STEPS FOR THE PREVENTION OF MODERN SLAVERY

We are committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015.

All employees have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employees' obligations under their contract of employment.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chain, we also recognise that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measures:

- I. Conduct risk assessments to determine which parts of our business and which of our customers are most at risk of modern slavery so that efforts can be focused on those areas
- II. Engage with our customers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their business

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- III. Identify and monitor potential risk areas in our supply chains so ensure that all customers are adhering to the Anti-Slavery Policy
- IV. Protect whistleblowers

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and customers to comply with our values.

We have a dedicated compliance department who is responsible for ensuring compliance to the Anti-Slavery Policy within the business.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to relevant members of staff. All directors have been briefed on the subject.

ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

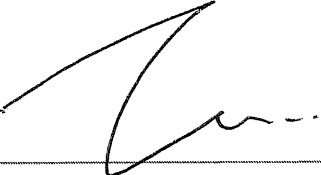
Whistleblowing Policy

The Company's Whistleblowing Policy is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner. The Whistleblowing Policy applies to employees and may be found in section 2.5 of the Company's compliance manual.

In summary, the team member should approach the Head of Human Resources. If the matter is extremely serious then a director of the Company should be approached. The nature of the complaint will determine the Company's next course of action.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2017.

Toyota Tsusho Metals Limited

By: 

Takuya Suehiro – Senior Executive Officer

Date: 31/Mar/2016