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Slavery and Human Trafficking Statement.

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 provide customers the ability 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 SMBC Nikko Capital Markets ("CM Limited") for the financial year ending 31 March 2018.

CM Limited's business

CM Limited is a financial institution regulated by the Financial Conduct Authority (FCA), and is incorporated in England and Wales. Sumitomo Mitsui Banking Corporation ("SMBC"), a Japanese banking institution, owns 85% of the voting shares of CM Limited. SMBC Nikko Capital Markets Inc ("SMBC Nikko") a Japanese financial institution, owns the remaining 15% of the voting shares of CM Limited. SMBC and SMBC Nikko are in turn wholly-owned subsidiaries of Sumitomo Mitsui Financial Group, a financial services conglomerate that is also incorporated in Japan.

Further information on CM Limited's business can be found in our annual report and financial statements, which can be accessed at: [Financial Information](#)

CM Limited's stance on Slavery and Human Trafficking

CM Limited is committed 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.

CM Limited 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.

Customers

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

As part of its on-boarding and periodic customer due diligence processes, CM Limited performs 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 CM Limited cause for concern.

Staff

In order to ensure proper understanding of the risks posed by Slavery and Human Trafficking in the context of CM Limited's supply chains and business, CM Limited employees responsible for the above areas have received 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 CM Limited's business activities, either through their standard reporting line, or through CM Limited'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

Governance

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

Questions, comments and requests regarding this Statement are welcomed and should be addressed [here](#).

Approval

This Statement was approved by the CM Limited Board of Directors on 18 October 2018 and has been signed on behalf of the Board by Mr Antony Yates, Chief Executive Officer.

Supply Chain

CM Limited takes appropriate steps to verify, evaluate and mitigate the risk that Slavery and Human Trafficking may occur in its supply chain. In particular, CM Limited 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 CM Limited cause for concern.


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