

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 2016/2017 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 Shigeya Kusano, the Managing Director.

Organisation’s 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.

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.

The Code was updated in December 2016 and all employees were requested to re-familiarise with the contents and to re-submit a signed acceptance.

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

- Sojitz Group CSR Policy
- Sojitz Environmental Policy

- Sojitz Group CSR Action Guidelines for Supply Chains
- Anti-Corruption Rules

The Anti-Corruption Policy was also updated in December 2016 and all employees were duly notified.

Supply Chain

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

Our Due Diligence Screening – recent enhancements

In the past, those parties with whom we have direct contractual agreements were screened manually every three months.

As part of our initiative to increase internal controls, the database software used to conduct due diligence was upgraded in April 2016. The system has been updated with the capability to check all contacts automatically on a daily basis to detect any reported links with modern day slavery and human trafficking. The upgrade also provides enhanced case management capabilities where comments may be entered as part of our audit trail within the system.

Further, in an effort to measure our risk exposure generally, a detailed risk assessment was recently completed which identified categories of risk relevant and significant to our business. We reviewed all transactions from the perspective of exposure to modern day slavery and human trafficking.

We continue to carry out periodic risk assessments to identify the risks pertaining to our businesses.

Effective Management of Slavery and Human Trafficking

Updates have been made in the company procedures, rules and regulations and we are committed to continuing to enhance our capability to identify, prevent and mitigate impacts associated with slavery and human trafficking in our business. Those in the supply chain that are indirectly connected to us are not fully visible and further investigation based on country and industry risk may be undertaken in the future to satisfy ourselves of our ongoing commitment to CSR.



Shigeya Kusano, Managing Director of Sojitz Europe Plc

23 October 2017