



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 ending 31 March 2020 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, a director and CEO & President of the Region.

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 (“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”) represent a set of decision-making standards established to act as the foundation for all of Sojitz Group’s (“the Group”) business activities around the world.

The Code has been translated into 23 languages to enable all employees in the UK and Group employees overseas to acquire a shared compliance mindset.

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

- Sojitz Environmental Policy
- Sojitz Group CSR Action Guidelines for Supply Chains (“CSR Guidelines”)
- Anti-Corruption Rules
- Wood Procurement Policy
- Sojitz Group Human Rights Policy

We now have a privacy notice on our Europe region website to explain our approach regarding data protection and individual rights: http://www.europe.sojitz.com/pdf/Privacy_Notice.pdf

Further face-to-face training was conducted at our London office between November 2019 and January 2020 to promote understanding by our staff regarding such rights.

Supply Chain:

As a general trading company developing business around the world, we are involved in a wide variety of supply chains including producers of raw material, manufacturers, distributors and agents located globally and across all business divisions.

Working with the Group companies and our supply chains to reduce environmental and social (human rights) risks continues to be an important issue for us.

The Sojitz Group Sustainable Supply Chain Handbook was established in September 2019 ("Supply Chain Handbook") which shares the Group's sustainability-oriented policies and goals and concrete, real examples of risks in business and how these risks were addressed. Additionally, it aims to deepen understanding of human rights risks and efforts to improve working environments, as well as encourage readers to make these efforts themselves.

The Supply Chain Handbook is available on the Group company website:
https://www.sojitz.com/en/csr/supply/pdf/handbook_e_200401.pdf

Our Due Diligence Screening:

As part of our Know Your Customer due diligence process, we have this year migrated our database to streamline to the Group screening system. The screening system continues to provide wide-ranging information on organisations and individuals, including sanctions lists, corruption and human rights violations. The information is used for our decision-making process.

Following the introduction of an internal compliance programme for the Europe region in February 2020 ("ICP"), we have expanded our screening to be more comprehensive. We now aim to assess each new transaction individually - from the manufacturer/supplier to our customer/end user. We have conducted extensive online and face-to-face training to ensure there is understanding by the business teams and support staff regarding the ICP requirements and the importance of screening and risk assessment.

Effective Management of Slavery and Human Trafficking:

It is too early to say with any certainty how effective the additional ICP due diligence screening is in preventing modern slavery from taking place in our supply chain. However, we expect that by carrying out deeper analysis of our business transactions, we will increase our understanding of potential infringements of human rights laws in our supply chain and transactions generally.

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

CSR related analysis with particular emphasis in the Europe region is being considered for 2020/21 and updates continue to be considered in the company procedures, rules and regulations.

A handwritten signature in blue ink, appearing to read 'S. Takahama', with a horizontal dotted line underneath.

Satoru Takahama

Director of Sojitz Europe Plc

Date: 27 July 2020