



## 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 2021 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 Austria, Czech Republic, France, Germany, Hungary, Italy, Poland, Russia, Spain, Turkey and Ukraine (“the Region”).

Our business is currently organised into 7 business divisions: (i) automotive, (ii) infrastructure and healthcare, (iii) aerospace and transportation projects, (iv) metals mineral resources and recycling, (v) chemicals, (vi) consumer industry and agriculture and (vii) retail and consumer service division.

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. E-learning has been offered to employees to reinforce understanding of the Code.

The Code has continued to be made clear and public on the Group company website:

[https://www.sojitz.com/en/corporate/governance/compliance/pdf/compliance\\_e.pdf](https://www.sojitz.com/en/corporate/governance/compliance/pdf/compliance_e.pdf)

The Code is also shared with business contacts and often accompanied by e-learning training to ensure employees and business contacts have a similar standard of compliance and business practice.

The Code was last reviewed in 2016 and is currently being reviewed again to be updated to include specific mention on human rights. An updated Code is aimed to be available in 2022.

As well as our Code, we have the following Group policies to promote and assist our staff with good business practice:

- Sojitz Environmental Policy
- Sojitz Group CSR Action Guidelines for Supply Chains (“CSR Guidelines”)
- Anti-Bribery Policy and Anti-Corruption Rules
- Wood Procurement Policy
- Sojitz Group Human Rights Policy
- Sojitz Tax Policy
- Sojitz Sanctions and Export Controls Policy

Our Anti-Bribery Policy and Anti-Corruption Rule are also being reviewed and an updated version is aimed to be available during 2021.



### **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 continue to be important issues for us.

Where we have had direct opportunities through supply chain questionnaires to answer and supply documents, we have actively provided details regarding the policies and procedures that the company follows including referencing the Sojitz Group Sustainable Supply Chain Handbook which include the Sojitz Group Human Rights Policy.

### **Our Due Diligence Screening:**

As part of our Know Your Customer due diligence process, we have continued to use the same screening system. The screening platform provides wide-ranging information on organisations and individuals, including sanctions lists, corruption, adverse media reporting including human rights violations. The level of assessment is aligned with the level of risk and the screening outcome is used for our decision-making process.

We currently have a comprehensive screening system where parties to potential new business transactions are screened. This includes indirect business contacts. Adverse findings are flagged up and considered case by case. We have continued to conduct video training to ensure there is understanding by the business teams and support staff regarding the screening requirements and risk assessment.

### **Effective Management of Slavery and Human Trafficking:**

We have also introduced a new Whistleblowing Policy in the Region reaffirming our zero-tolerance approach to modern slavery occurring in our supply chain and asking employees to report any incident witnessed or suspicion of a situation that could amount to modern slavery.

As well as revising company policies, we have, this year, taken positive steps to raise modern slavery awareness by employees based in the Region's headquarters in London. To date, we have put up informative posters and leaflets in communal parts of the office followed by an e-mail circular to alert staff about them. The details were of global trade context to keep it relevant to the line of our business. We have also reminded our employees about the Sojitz Group Human Rights Policy by attaching a web link. Web link to the UK government website was also included to encourage further reading on the matter.

The company's general stance on modern slavery has continued to be made clear and public on the Group company website: <https://www.sojitz.com/en/csr/humanrights/>

Revision and updates continue to be considered to ensure we build on the work towards tackling modern slavery.

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

Satoru Takahama

Director of Sojitz Europe Plc

Date: 27 July 2021