



MITSUI BUSSAN COMMODITIES LTD

ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT

1. Introduction

This statement sets out our commitment to the Modern Slavery Act 2015, including the measures taken to ensure slavery and human trafficking is not taking place within our organisation or our supply chains.

2. Organisation

Mitsui Bussan Commodities Ltd (MBCL) is an international financial services firm regulated by the UK Financial Conduct Authority. Headquartered in London, MBCL has subsidiaries in New York and Singapore, which are regulated by the CFTC and NFA (US) and MAS (Singapore) respectively.

MBCL is wholly owned by Mitsui & Co. Ltd. Headquartered in Japan, Mitsui & Co. Ltd. is publicly listed and has been a signatory to the UN Global Compact since 2004.

3. Our Business

Our business is to provide commodity risk management services to a global client base. Our primary business involves trading in exchange traded and OTC Derivatives.

Our annual consolidated turnover is above the £36M threshold specified in the Modern Slavery Act.

4. Our Supply chains

Our supply chains are generally short and indirect, in that we do not re-sell goods and services. Furthermore, the goods and services we do provide are typically consumed by our clients directly.

Metals Warrants and emission certificates are the only exceptions.

5. Policy

MBCL supports human rights and has adopted a Code of Conduct that promotes ethical behaviour. MBCL has also adopted various policies that work to prevent slavery or human trafficking.

6. Measures

- Risk Assessment – We have performed a risk assessment that has been reviewed by senior management.
- Whistleblowing – Whilst the overall risk is considered to be low, we take the issue seriously and have a whistleblowing framework to encourage people to raise an alert where they have any suspicion.
- Staff – MBCL employs over 120 globally and its employment, recruitment and remuneration practices are designed to comply with the laws and regulations of the jurisdictions in which we operate.
- Suppliers – MBCL buys goods and services to run its business, including professional services, IT goods, facilities, and travel. MBCL uses locally or internationally reputable suppliers. We undertake due diligence on certain key suppliers. MBCL has committed to taking additional due diligence, contractual, and monitoring measures around their Modern Slavery Act practices going forward.

- Clients – MBCL serves a global client base. Our clients are subjected to due diligence and monitoring. In future we will look to undertake additional due diligence measures.
- Metrics – We will establish metrics over time to support our efforts to prevent modern slavery and will report on them to senior management.

7. Training

Staff awareness is a key measure in preventing slavery and human trafficking. Accordingly, we have provided training to our staff and will look to periodically update this training in future.

8. Annual Review

This statement is produced in line with section 54 of the Modern Slavery Act 2015 and is for the financial year ending March 31, 2018. This Statement will be reviewed annually and updated as required.

The Board of MBCL has approved this statement and it is signed by our CEO, Mr Hiro Aoyagi.

Approved by Board March 2018

Uploaded 1st November 2018