



MITSUI BUSSAN COMMODITIES LTD

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ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT

Introduction

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

Organisation

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

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 over-the-counter Derivatives.

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

We consider the risk of modern slavery and human trafficking within our operations to be low as our offices are located in lower risk jurisdictions, we operate in a regulated environment, providing financial services, and primarily employ qualified and experienced staff.

Our Supply chains

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

Policy

MBCL has adopted a range of policies—including a Physical Precious Metals Supply Chain Policy, Third-Party Risk Management Policy, Outsourcing Policy, Whistleblowing Policy, Disciplinary and Grievance Procedure, and Equality, Diversity & Inclusion Policy—which collectively support the prevention of slavery and human trafficking.

Measures

- Whistleblowing – Whilst the overall risk is considered to be low, we take the issue of Modern Slavery seriously and have a whistleblowing framework to encourage people to raise an alert where they have any suspicion.
- Staff – MBCL employs over 300 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 procures goods and services necessary for the operation of its business, including professional services, IT goods, catering, and property services. MBCL engages suppliers that are locally or internationally reputable and undertakes appropriate due diligence on key suppliers to assess integrity and risk.
- Clients – MBCL serves a global client base. Our clients are subjected to risk based due diligence, screening and ongoing monitoring. Higher risk scenarios therefore undergo more extensive assessment, oversight, and approval measures.

Training

Staff awareness is a key measure in preventing slavery and human trafficking. Accordingly, we issue a course on Modern Slavery as part of our mandatory staff induction training and annual training for all staff.

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, 2026. This Statement will be reviewed annually and updated as required.

The Board of MBCL approved this statement on 20th June 2026 and it was signed by our CEO, Mr Ryutaro Takeuchi on 20th June 2026.

Authorised and regulated by the Financial Conduct Authority
Associate Broker Clearing Member of the London Metal Exchange
A subsidiary of Mitsui & Co., Ltd., incorporated in Japan
Registered in England No. 4395895.
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