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- [PDF](#) Pillar 3 disclosures (SMBCE – 31 March 2009)

Remuneration

Remuneration disclosures from 2017 onwards are included within Pillar 3.

- [PDF](#) Remuneration disclosures (SMBCE – 31 March 2016)

[PDF](#) [Remuneration disclosures \(SMBCE – 31 March 2015\)](#)

[PDF](#) [Remuneration disclosures \(SMBCE – 31 March 2014\)](#)

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BRIBERY & CORRUPTION

UK Bribery Act 2010

SMBC Group is committed to preventing bribery and corruption in accordance with applicable anti-bribery legislation in all markets and jurisdictions in which it operates. This includes, but is not limited to, full compliance with the UK Bribery Act 2010. The SMBC BI statement of anti-bribery principles sets out the requirements for employees and third parties in relation to bribery and corruption and ethical conduct.

[PDF](#) [Statement of anti-bribery principles \(SMBC BI\)](#)

FOREIGN EXCHANGE & TREASURY

Foreign exchange

Foreign exchange (FX) currency remittance rates are published at the start of each business day for customers to determine the conversion rate applied for low value remittances.

Wholesale FX

The wholesale FX disclosure sets out the main terms of SMBC Group for FX dealing with its customers and other market participants in principal-to-principal transactions, whether by voice or electronic means, in the wholesale FX markets with respect to FX spot, options, swaps and deliverable and non-deliverable forwards.

[PDF](#) [Wholesale FX disclosure](#)

FX Global Code

SMBC BI acknowledges that the FX Global Code represents a set of principles generally recognised as good practice in the wholesale foreign exchange market. As a market participant, SMBC BI is committed to conducting its activities in a manner consistent with the principles of the code.

[PDF](#) [Full statement of commitment to the FX Global Code \(SMBCE\)](#)

UK Money Markets Code

The United Kingdom Money Markets Code represents a set of principles generally recognised as good market practice in the UK money markets. As a market participant, SMBC BI is committed to conducting its activities in a manner consistent with the principles of the code.

[PDF](#) [Full statement of commitment to the UK Money Markets Code \(SMBCE\)](#)

GENDER PAY

[PDF](#) [Gender pay report \(SMBC BI London – 2020\)](#)

[PDF](#) [Gender pay report \(SMBC BI Paris – 2020\)](#)

[PDF](#) [Gender pay report \(SMBCE London – 2019\)](#)

[PDF](#) [Gender pay report \(SMBCE Paris – 2019\)](#)

[PDF](#) [Gender pay report \(SMBCE London – 2018\)](#)

[PDF](#) [Gender pay report \(SMBCE London – 2017\)](#)

SMBC Group is an equal opportunities employer. See [diversity and inclusion](#) for more information.

INACTIVE ACCOUNTS

French Eckert law

Disclosure of inactive bank accounts in relation to French law number 2014-617 of 13 June 2014, known as Eckert law.

En français (in French)

[PDF](#) [Publication des comptes inactifs \(SMBC BI Paris – 31 décembre 2021\)](#)

INTRAGROUP MARKET EXEMPTION

European Market Infrastructure Regulation

SMBC Group has submitted applications to the relevant European Union regulators in respect of the exemption from margin requirements for intragroup transactions under Article 11 of European Market Infrastructure Regulation (EMIR) and Commission Delegated Regulation (EU) 2016/2251 supplementing EMIR with regard to regulatory technical standards on risk mitigation techniques for over-the-counter (OTC) derivative contracts not cleared by a central counterparty. The exemptions apply to initial and variation margin requirements.

[PDF](#) [Intragroup market exemption \(SMBCE\)](#)

[PDF](#) [Intragroup market exemption \(SMBC EU\)](#)

MONEY LAUNDERING

Wolfsberg questionnaire

The Wolfsberg Group is an association of 13 global banks which aims to develop frameworks and guidance for the management of financial crime risks. The Wolfsberg questionnaire has been developed in order to assist firms conducting due diligence, allowing them to assess the financial crime risk consistently across the financial industry. In line with industry best practice, SMBC BI and SMBC EU have completed the questionnaire as an aid to the due diligence process.

[PDF](#) [Wolfsberg questionnaire \(SMBC BI\)](#)

[PDF](#) [Wolfsberg questionnaire \(SMBC EU\)](#)

PENSIONS

UK Occupational Pension Schemes Regulation

In accordance with pensions regulation, the trustees of the Sumitomo Mitsui Banking Corporation Europe Limited Pension Scheme (defined contribution) have prepared statements covering a number of important areas for its members. The reports are signed by the chair of trustees and have been prepared to demonstrate how the trustees of the board have complied with statutory governance regulation, which is key to the running of our defined contribution section of this scheme.

[PDF](#) [Statement of implementation \(SMBCE – December 2020\)](#)

[PDF](#) [Statement of investment principles \(SMBCE – June 2020\)](#)

[PDF](#) [Defined contribution chair's statement \(SMBCE – 2018\)](#)

SLAVERY & HUMAN TRAFFICKING

UK Modern Slavery Act 2015

The Modern Slavery Act 2015 ("the Act") of the United Kingdom requires certain businesses to provide disclosure concerning their efforts to address the issues of slavery and human trafficking in their supply chain. The disclosure is intended to assist customers with the ability to make better, more informed choices about the products and services they buy and the companies they support.

Slavery and human trafficking refers to a variety of offences, including but not limited to:

- Slavery, servitude and forced or compulsory labour
- Sexual exploitation, including all offences contemplated in Part 1 of the UK Sexual Offences Act 2003
- Removal and trafficking of organs outside the context of authorised health treatments
- Securing services or other type of benefits by force, threats or deception
- Securing services or other type of benefits from children and vulnerable persons.

SMBC BI's stance on slavery and human trafficking

SMBC BI adheres to the SMBC Group commitments to corporate social responsibility (CSR), and the [SMBC Group policy statement on human rights](#). SMBC Group stipulates its commitment to respecting human rights, and aims to eliminate all forms of exploitative labour practices in its business and supply chains.

The main principle guiding SMBC BI's approach to slavery and human trafficking is that it should not be involved, directly or indirectly, in the commission or facilitation of the offences specified by the act.

SMBC BI demonstrates an ongoing commitment to maintaining and improving systems and processes to mitigate the risk that it might be involved, wittingly or unwittingly, in the commission of slavery and human trafficking in any part of its operations, supply chain (including customers, contractors and suppliers), products, services and staff activities.

SMBC BI also ensures that its staff, suppliers and business partners to adhere to the same high standards

SMBC BI also expects its staff, suppliers and business partners to adhere to the same high standards and to take reasonable steps to ensure that other third parties they do business with adhere to those standards as well.

Governance

SMBC BI senior management are responsible for establishing a culture in which modern slavery is not tolerated in any form, ensuring that all SMBC BI staff are aware of the risks, so that informed decisions are made in a timely way, which mitigate and manage these risks.

SMBC BI has established an anti-slavery policy, which sets out the processes through which it seeks reasonable assurance that none of its customers, business partners, suppliers and other third parties are involved in the commission or facilitation of slavery or human trafficking.

Risk assessment

SMBC BI has enhanced its risk assessment of countries, industry sectors, goods and products, which have been reported to be involved in the potential commission or facilitation of slavery and human trafficking. Specifically, the assessment of goods and industry sectors has been updated in line with the [United States Department of Labor – Bureau of International Labor Affairs \(ILAB\) list of goods produced by child labour or forced labour](#).

Due diligence

All departments involved in due diligence processes are required to conduct appropriate checks in order to obtain reasonable assurance that customers, business partners, suppliers, and other third parties are not involved in the commission or facilitation of slavery and human trafficking.

SMBC BI requires specific anti-slavery due diligence to be undertaken on all its counterparties, and applies consistent due diligence measures for slavery and human trafficking, whereby suppliers, contractors, customers and any other business partners are all subject to the same level of identification, verification, and risk evaluation.

In addition, in the course of conducting due diligence processes, all customers, business partners, suppliers and other third parties are subject to adverse news screening, incorporating specific terms relevant to slavery and human trafficking.

Supply chain and customers

SMBC BI expects its suppliers and customers to undertake ethical business practices, particularly in, but not limited to, economic sectors where there are higher risks of slavery and human trafficking.

SMBC BI takes appropriate steps to mitigate the risk that slavery and human trafficking may occur in its supply chain, or that its products and services may be used by a customer for the commission or facilitation of slavery and human trafficking.

SMBC BI has further enhanced these steps by producing more detailed guidance, which provides information on equivalent CSR and environmental, social and governance (ESG) policies, as well as countries, industry sectors, goods and products identified as having a higher risk of slavery and human trafficking.

Furthermore, in relation to trade finance business, controls have been established to mitigate the risk of the possible commission or facilitation of slavery and human trafficking. All trade finance transactions are subject to checks to obtain reasonable assurance that the goods have not been produced by forced, trafficked or child labour. Additional checks are undertaken where the industry sector or country of origin are known to allow, tolerate or encourage forced, trafficked or child labour.

sector, or country of origin are known to allow, tolerate or encourage forced, trafficked or child labour.

Staff

In order to ensure proper understanding of the risks posed by slavery and human trafficking in the context of SMBC BI's supply chains and business, SMBC BI provides training to staff on slavery and human trafficking and the requirements of the Act.

Members of staff are encouraged to report any instances of suspected slavery and human trafficking identified in any part of SMBC BI's business activities. The options for raising concerns and reporting are incorporated within SMBC BI's "Speak Up" framework, including internal reporting lines, and SMBC BI's whistleblowing programme.

It is equally important for SMBC BI to demonstrate that no relevant offences are committed within its premises or in relation to its own employees. Human resources have the responsibility to demonstrate, through the introduction of appropriate controls, that SMBC BI's own employees are being treated in line with local laws and regulations, and are not victim of any of the relevant offences as a result of their employment.

Statements

[PDF](#) [Full statement on slavery and human trafficking \(SMBC BI – 2021\)](#)

[PDF](#) [Full statement on slavery and human trafficking \(SMBC BI – 2020\)](#)

[PDF](#) [Full statement on slavery and human trafficking \(SMBCE – 2020\)](#)

[PDF](#) [Full statement on slavery and human trafficking \(SMBCE – 2019\)](#)

[PDF](#) [Full statement on slavery and human trafficking \(SMBCE – 2018\)](#)

[PDF](#) [Full statement on slavery and human trafficking \(SMBCE – 2017\)](#)

[PDF](#) [Full statement on slavery and human trafficking \(SMBCE – 2016\)](#)

Contact

Questions, comments and requests regarding this statement are welcomed and should be addressed to smbcbimsa@gb.smbcgroup.com

UNITED KINGDOM TAX STRATEGY

UK Finance Act 2016 Schedule 19

The British government introduced legislation in 2016 which requires large businesses operating in the United Kingdom to publish their tax strategy. The tax affairs of SMBC Group in the UK are managed in a manner that is consistent with the bank's philosophy on corporate social responsibility.

[PDF](#) [United Kingdom tax strategy](#)

UNITED STATES FOREIGN BANK CERTIFICATION

USA Patriot Act 2001

The information contained in this certification is sought pursuant to sections 5318(j)(k) of title 31 of the United States code, as added by sections 313 and 319(b) of the USA Patriot Act 2001 (public law 107-56).

[PDF](#) [Patriot Act certification \(SMBC BI\)](#)

[PDF](#) [Patriot Act certification \(SMBC EU\)](#)

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