

Sumitomo Mitsui Banking Corporation Slavery and Human Trafficking Statement

Background

By virtue of having established its London Branch, Sumitomo Mitsui Banking Corporation (SMBC) is required to comply with the Modern Slavery Act 2015 (the “Act”) of the United Kingdom. The Act 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 provide customers the ability to make better, more informed choices about the products and services they buy and the companies they support.

This document comprises the Slavery and Human Trafficking Statement of Sumitomo Mitsui Banking Corporation for the financial year ending 31 March 2019.

SMBC's business

SMBC is a banking institution licensed and regulated by the Japanese Financial Services Agency (JFSA), and is incorporated in Japan. SMBC is a wholly-owned subsidiary of Sumitomo Mitsui Financial Group, Inc. (SMFG).

Further information on SMBC's business can be found in SMFG's annual report and financial statements, which can be accessed at:

<https://www.smfg.co.jp/english/investor/financial/>

SMBC's stance on Slavery and Human Trafficking

SMFG has published a Statement on Human Rights, which recognizes the ethical responsibility to support and respect the protection of internationally proclaimed human rights, and to prevent complicity in human rights violations.

SMBC supports the principles of the “United Nations Global Compact” in the areas of human rights, labor standards, environment and anti-corruption measures.

SMBC complies with applicable laws and regulations in the regions and countries where it does business.

SMBC believes that it has an ethical responsibility to promote human rights by showing respect for human rights through its own behavior, and by sharing its ethos with its customers.

SMBC is committed 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, customers and supply chain (including contractors and suppliers), products, services and staff activities.

SMBC 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 recognises that the protection of human rights and its responsibilities thereof is an evolving area, and is committed to an ongoing review and assessment of its business practices and approach to human rights in light of changing global circumstances.

SMBC seeks to ensure that it provides a workplace free from any type of violation of employees' human rights, including but not limited to forced labor, harassment and discrimination without distinction of any kind such as race, gender, sexual orientation, gender identity, religion, creed, national origin, disability, family status and birth status.

In addition, appropriate Anti-Slavery policy and procedures have been implemented within SMBC London Branch. These provide detailed guidance on what constitutes an offence and the controls in place to mitigate the risk that the branch may be directly or indirectly involved in the commission of Slavery and Human Trafficking.

Supply Chain

SMBC takes appropriate steps to verify, evaluate and mitigate the risk that Slavery and Human Trafficking may occur in its supply chain. In particular, SMBC London Branch also performs due diligence on suppliers and contractors, which includes an analysis of the activity carried out and a detailed review of publicly available information, in order to identify instances that may give cause for concern in relation to Slavery and Human Trafficking.

Customer

SMBC's Credit Policy prohibits granting credit to certain businesses and customers, which include entities with problems from the perspective of public order and morals. Also, SMBC prohibits origination of loan for certain types of business where human rights abuses such as child labor is, or may be, taking place, or is likely to take place.

Furthermore, SMBC London Branch takes appropriate steps to identify, evaluate, and mitigate the risk that its products and services may be used by a customer for the commission of Slavery and Human Trafficking.

This comprises a series of checks on its customers, including but not limited to, an analysis of the activity carried out and a detailed review of publicly available information, in order to identify instances that may give cause for concern in relation to Slavery and Human Trafficking.

As part of the on-boarding and periodic customer due diligence processes, all customers are assessed to determine if they fall within the scope of the Act, and, if so, a copy of their Anti-Slavery Statement is sought and retained. Furthermore, in relation to trade finance, all transactions are subject to checks to ascertain that the goods and country of origin are not prohibited under its Anti-Slavery policy and procedures.

Staff

All employees of SMBC are encouraged to identify and report immediately via SMBC's whistle-blowing program, without fear of retaliation, any conduct that the employee knows or reasonably believes would violate legal or regulatory requirements or ethical standards, which include, but are not limited to internal policies and guidance in relation to human rights.

Additionally, in order to ensure proper understanding of the risks posed by Slavery and Human Trafficking, the employees in SMBC London Branch receive training on Slavery and Human Trafficking and the requirements of the Act.

Slavery and Human Trafficking

As used in this Statement, the above term refers to a variety of offences, including but not limited to:

Slavery, servitude and forced or compulsory labor;

Sexual exploitation, including all offences contemplated in the Part 1 of the UK Sexual Offences Act 2003;

Removal and trafficking of organs outside the context of authorized health treatments;

Securing services or other type of benefits by force, threats or deception; and

Securing services or other type of benefits from children and vulnerable persons.

Approval

This Statement was approved by the SMBC Board of Directors on July 29th, 2019 and has been signed on behalf of the Board by Mr. Toshikazu Yaku, Director and Deputy President.

A handwritten signature in black ink, appearing to read "Toshikazu Yaku", written in a cursive style.

Toshikazu Yaku

Director and Deputy President

Sumitomo Mitsui Banking Corporation