

# TOYOTA TSUSHO METALS LIMITED

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## Modern Slavery Statement

### What is modern slavery?

Modern slavery is a fundamental breach of human rights. It is a global industry which takes many forms, such as slavery, servitude, forced or compulsory labour, and human trafficking. It is the responsibility of organisations and individuals around the world to eradicate this practice which, according to a UN study, claims more than 40 million victims. It is, therefore, of critical importance that organisations ensure that slavery and human trafficking are not taking place in their businesses or in any of their supply chains.

### The law on modern slavery

The Modern Slavery Act 2015 came into force in the UK on 29 October 2015. It created specific offences aimed at tackling slavery and human trafficking. The legislation also requires commercial organisations, incorporated or carrying on business in the UK, supplying goods or services with a turnover in excess of £36 million, to publish a slavery and human trafficking statement each financial year in order to demonstrate the steps it has taken to ensure that slavery or human trafficking are not taking place in its business or its supply chains.

### Our business

Toyota Tsusho Metals Limited specialises in futures and options trading in the non-ferrous metals market and precious metals market. We are a wholly owned subsidiary of Toyota Tsusho Corporation located in Nagoya, Japan. The Group has a global annual turnover in excess of £36m.

TTM has in place a comprehensive due diligence process for each of our clients in and we are committed to implementing this across the business. We also have in place an on-boarding process for employees in each jurisdiction which complies with national laws, such as evidence of right to work, contracts of employment and ensuring employees or apprentices are 16 or over.

The business is always striving to incorporate into its business model corporate social responsibility, the purpose of which is to build relationships and leave a lasting legacy on society and the environment.

### The risks

In the sector in which TTM operates the risk of modern slavery is low but that does not mean that we take our responsibilities lightly. While we have in place a number of controls and initiatives to tackle modern slavery and other criminal behaviour, there are still steps we want to take in order to ensure that such abhorrent practices do not form part of our business or the businesses of our clients.

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The highest risk of modern slavery would be in our supplier chains and business undertaken in high-risk locations. It is our responsibility to ensure that those with whom we enter into business are not involved in slavery or human trafficking at any stage in the provision of their services.

The approach taken to approve and monitor each client will be proportionate depending on the client's (and its sector's) risk-rating. Our aim is to make all clients aware of our collective responsibilities in relation to modern slavery and put in place systems and controls to monitor clients across jurisdictions in accordance with their assigned risk-rating.

TTM is committed to making all employees aware of modern slavery and its ramifications as well as putting in place a procedure, as part of our whistleblowing policy and procedure, for confidentially reporting any suspicion of slavery or human trafficking.

## **Our policy**

TTM adopts a zero-tolerance approach to slavery and human trafficking and all forms of corruption and bribery directly and indirectly associated with these criminal acts.

We are committed to ensuring that slavery or human trafficking does not form part of our, or our clients', business. We also aim to support a culture where any suspicion of modern slavery is raised with us in confidence and without delay.

TTM's slavery and human trafficking statement is reviewed annually.



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Toru Fujimori, Managing Director