### SLAVERY AND HUMAN TRAFFICKING STATEMENT (FY2017)

## ABOUT THE STATEMENT

CBC (Europe) GmbH ('CBCE') is a wholly owned subsidiary of CBC Co.,Ltd, a global trading company based in Tokyo, Japan. As a company doing business in the United Kingdom ('UK'), CBCE has produced this Slavery and Human Trafficking Statement (the 'Stetement') for the financial year ending 31st December 2017 ('FY2017') in line with the requirements of Section 54 of the UK Government's Modern Slavery Act 2015 (the 'Act').

The Statement is intended to communicate the steps that CBCE has taken during FY2017 to ensure that slavery and human trafficking are not occurring in any part of its business operations or supply chains. The Statement has been approved by CBCE's board of directors and has been signed by Koji Ikeda, COO and Managing Director of CBCE.

The Statement is publicly available on CBCE's website at the following link : <a href="https://www.cbc-europe.com/">https://www.cbc-europe.com/</a>

## **OUR COMPANY**

CBCE is a wholly owned subsidiary of CBC Co.,Ltd, a global trading company based in Tokyo, Japan that deals with a wide range of products such as synthetic resins, chemicals, pharmaceuticals, agrochemicals, foods, electronics components & devices, optical equipment, solar batteries, fuel cells, and textiles & clothing. CBC Co.,Ltd operates in 18 countries and regions and its global network includes over 30 group companies, employing a multinational workforce of over 2,700 people. For more information on CBC Co.,Ltd's history, products and business strategy, please visit the following link: www.global-cbc.com/en/index.html

# **OUR PHILOSOPHIES AND PRINCIPLES**

CBCE conducts its business in line with the philosophies and principles of CBC Co.,Ltd. The Five Corporate Principles – Complete Fairness in Corporate Activities; Thoroughly Manage the Information and Disclosure; Global Expansion of Business Activities; Contribution to Society; Consideration and Conservation of the Global Environment – established in the company's history, serve as CBC Co.,Ltd's core philosophy.

Based upon these Principles, the Corporate Standards of Conduct lay down a set of key, high-level commitments which form the basis of the company's compliance and risk management systems.

Furthermore, the Code of Conduct provides a set of rules based on both national and international standards to ensure that the company's employees are upholding the highest level of ethical conduct in their day-to-day business.

#### **OUR SUPPLY CHAINS**

CBCE acts as an intermediary and facilitator for trade within Europe and between Europe and Janan or other third countries (import, export and offshore trade). CBCE may sell the products directly to the customer (B2B) or through a distributor network. CBCE also provide services including finance and logistics. Further, CBCE is engaged in business investment, project development and management.

Given the wide-ranging nature of CBCE's business, the composition and complexity of our supply chains vary greatly. CBCE have estimated that our products are sourced from in excess of 30 countries. The total number is even higher when considering services.

## RELEVANT POLICY

The meaning of modern slavery and CBCE's commitment to the fight against modern slavery are expressed in our Modern Slavery Policy, accessible on our website at <a href="https://www.cbc-europe.com/">https://www.cbc-europe.com/</a>.

CBCE is committed to taking steps where reasonably practicable to ensure that modern slavery is not taking place in any part of its own business or in any of its supply chains.

## THE MODERN SLAVERY RISK

Adopting the Modern Slavery Policy was a first step towards CBCE having in place systems to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- monitor potential risk areas in our supply chains.

CBCE recognized that modern slavery may exist to a greater or lesser extent in most if not all countries and in most industries. Given the diverse range of our business activities and the number of countries into which our supply chains extend, it would be reasonable to assume that CBCE must therefore be at risk in respect of modern slavery to some extent.

The next step, to be completed during the financial year ending 31st December 2018 ('FY2018'), is for Business Units to review their supply chains against the US department of Labour ('DOL')'s "List of Goods Produced by Child Labour or Forced Labour" and report to the board of directors.

If any of our individual supply chains are found to involve a commodity that is listed by the DOL or any of the listed countries in any part of the supply chain then CBCE will evaluate these supply chains further, applying certain criteria where necessary to determine which should be accorded the highest priority. OTHER SPECIFIC STEPS ALREADY TAKEN PRIOR TO 31 DECEMBER 2017

- Our modern slavery policy was circulated in all employees of CBCE.

- Awareness raising activities on modern slavery to all members of staff was conducted.

PERFORMANCE INDICATORS

*In driving the performance of the business* 

Individual contracts very often contain performance and delivery conditions. However, our initial review suggested that we had not established, in respect of any particular supply chain or business and whether for internal use or for our suppliers, any formal performance incentives or indicators of the type that may unintentionally increase pressure on those who are producing the goods to a level which might in turn create an environment where acceptable labour standards are compromised.

In respect of reducing the risk of modern slavery occurring in our business or supply chains

CBCE will send our Modern Slavery Policy to our recent suppliers during FY2018.

**EFFECTIVENESS** 

It is too early to say with any certainty how effective the steps we are taking and will be taking in ensuring that modern slavery is not taking place in our business or supply chains. However, as a result of the steps taken so far we are confident that the risks are now much better understood.

This Statement relates to CBCE's financial year ended 31 December 2017 and, where noted, steps taken subsequently up to the date shown below.

Signed:

Koji Ikeda

COO and Managing Director

CBC (Europe) GmbH

Date: 29-06-2018