

# Modern Slavery Act Statement

NOMURA EUROPEAN INVESTMENT LIMITED NOMURA PROPERTIES PLC

SEPTEMBER 2022



## INTRODUCTION

This statement applies to Nomura European Investment Limited, and its subsidiary Nomura Properties Plc (together, "Nomura").

At Nomura, we believe we have a responsibility to ensure that our business is conducted in an ethical way and we actively address social issues.

As part of this process, we have in place a Modern Slavery and Human Trafficking Policy (the "MSA Policy"), which seeks to identify and manage slavery and human trafficking risk in our business and supply chains in accordance with the principles and goals promoted by the Modern Slavery Act 2015 and related guidance.

In addition to the MSA Policy, we have in place <u>Nomura's Corporate Social Responsibility</u> commitments, a <u>Code of Conduct Policy</u> and a Speaking Up Policy, which consider our social and human rights responsibilities.

This statement is published in line with the United Kingdom's Modern Slavery Act 2015, and is made in respect of the financial year ending 31 March 2022. References "we", "us" or "our" are to Nomura.

## **ORGANISATION'S STRUCTURE**

Nomura is a banking and financial services business, providing investment, financing and related services to corporate and government customers on a global basis. Nomura Holdings, Inc. is the ultimate parent company of Nomura and has its head office in Tokyo, Japan.

#### SUPPLY CHAIN AND SUPPLIER DUE DILIGENCE

Nomura's supply chains are relatively simple and the nature of goods and services provides limited opportunity for modern slavery and/or human trafficking practices. However, it is important that Nomura continues to monitor this.

Nomura includes additional enquiries in its procurement processes for goods, services and locations that are assessed as having a high risk of modern slavery and/or human trafficking. Also, we include a clause relating to modern slavery and human trafficking in our agreements with third parties for the supply of goods and services except where we have assessed such third parties to have equivalent controls in place and have issued a public statement to this effect.

In addition, as part of our initiative to identify and manage slavery and human trafficking risk:

- we are continuing to build and improve our systems to better (i) identify, assess and monitor potential higher risk areas in our supply chains; (ii) mitigate the risk of slavery and human trafficking occurring in our supply chains through enhanced contract term controls; (iii) train relevant employees as to these risks and the need to manage them; and (iv) protect whistle blowers;
- we build relationships with reputable suppliers and ensure that expectations of business behaviour are both clear and consistent; and
- (i) we expect our direct suppliers to have suitable anti-slavery and human trafficking policies and processes; and (ii) we will communicate our expectation that those suppliers must prohibit modern slavery and human trafficking in their supply chains and that they should work with their suppliers at each stage in their supply chains to manage slavery and human trafficking risk.



#### **POLICIES**

Nomura has in place a number of policies that support our commitment to operating in an ethical manner:

- our MSA Policy outlines our key objectives in this area, including the steps taken in relation to our supplier diligence practices. Nomura's company directors have overall responsibility for this policy.
- our Code of Conduct (the "Code") outlines our commitment to working with pride and upholding the highest ethical standards. This Code applies to all directors, officers and employees and underpins other internal rules and regulations, including this statement.
- our Speaking Up Policy outlines the method Nomura employees can take to escalate concerns in the event any other employee working at or on behalf of Nomura is not in line with Nomura's Code and/or standards.
- our Anti-Bribery and Corruption Policy outlines our commitment to compliance with applicable laws and sets out linked Anti-Bribery and Corruption activities.

#### **IMPLEMENTATION**

Nomura's company directors shall have overall responsibility for the MSA Policy and this statement. Nomura's senior management ("**Nomura UK Management**") shall be responsible for implementing our MSA Policy and the objectives considered in this statement.

Nomura's Human Resources Department will monitor progress of our efforts and issues (should they arise) in this area and report back to Nomura UK Management directly.

Our MSA statement is available on the <u>Modern Slavery Registry</u>, <u>www.tiscreport.org</u> and the <u>Government Modern Slavery Registry</u>.

## **EFFECTIVENESS**

We continue to monitor our performance against the following in order to gauge how effective we are in dealing with the risk of slavery and human trafficking in our business or supply chains:

- training on modern slavery (see below);
- implementation of the MSA Policy;
- developing a system for supply chain identification, including, adding slavery and human trafficking enquiries and controls to our procurement policies;
- continuing to ensure that we pay employees above minimum wage/living wage plus benefits;
- asking specific questions on modern slavery as part of our procurement processes; and
- including a clause relating to modern slavery in our agreements with third parties for the supply of goods and services.

# **TRAINING**

Nomura continues to provide training to educate relevant employees on the importance of implementing and enforcing effective systems to mitigate the risk of slavery and human trafficking taking place within our business or supply chains. Periodic training is provided to employees with information on anti-slavery and



human trafficking legislation, mitigation measures, incident reporting and further details on this MSA statement.

## MONITORING AND REPORTING

If issues are identified in relation to modern slavery and/or human trafficking, these must be reported in accordance with Nomura's Speaking Up Policy.

More general issues in relation to the running of Nomura's MSA Policy will be reported back to the Human Resources Department and / or the Corporate Legal Department.

# **APPROVALS**

This statement was approved by the Board of Directors of Nomura European Investment Limited on 13 September 2022 and Nomura Properties PLC on 23 September 2022.

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Matthew Mirfield	
Name:	
Director of Nomura European Investment Limited  Date: 30 September 2022	
	Docusigned by: Stephen Fuggle B0F3775F4A4D423
Name:	Stephen Fuggle
Director of Nomura Properties PLC	

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the financial year ending 31 March 2022.

Date: 30 September 2022