

**MUFG Securities EMEA plc**  
**Slavery and Human Trafficking Statement**  
**Financial year ending 31 December 2023**

### **Introduction**

This statement sets out the steps that MUFG Securities EMEA plc (**'MUS(EMEA)'** or **'we'** or **'us'** or **'our'**) continue to take to ensure that modern slavery and human trafficking are not taking place in our supply chains or any other part of our business.

We continue to strive to maintain the highest professional and ethical standards and we expect the same from our suppliers. Slavery and human trafficking remain entirely contradictory to MUFG's Corporate Vision and Code of Conduct, and have no place in or around our organisation, and we are pleased to reinforce that principle through this statement.

This statement is published on behalf of MUS(EMEA) (pursuant to the UK Modern Slavery Act 2015) and a link is included in our Annual Report.

### **Organisation and Operations**

MUS(EMEA) is the London-based securities and investment banking subsidiary of Mitsubishi UFJ Securities Holdings Co., Ltd. MUS(EMEA) is authorised by the Prudential Regulation Authority ("PRA") and regulated by the Financial Conduct Authority ("FCA") and the PRA. It is a member of the International Capital Markets Association, the Association for Financial Markets in Europe, the Futures Industry Association and an associate member of the International Swap Dealers Association. MUS(EMEA) is active in the fixed income, equity, derivatives and structured finance markets.

The corporate structure of our organisation has not changed and MUS(EMEA) remains a financial institution incorporated in London. Our management team sits in London, and is responsible for ensuring that our corporate framework reflects MUFG's Corporate Vision and Code of Conduct.

### **Policies, Procedures and Processes/Due Diligence**

MUS(EMEA) is committed to the group's Corporate Vision and Code of Conduct, which has been reviewed and updated during the year to give our staff additional guidance on MUFG's expectations in relation to their conduct. During the year, all staff were provided with training on the Code of Conduct to remind them of the core principles and behavioural expectations.

The Code of Conduct requires, amongst other things, that MUS(EMEA) respect the human rights of all its employees, act with integrity, comply at all times with the letter and spirit of laws, regulations and rules that apply to us and combat criminal activity.

MUFG has also published a Human Rights Policy Statement which applies to the Group globally and which articulates the Group's dedication to the respect of human rights across all operations. This includes an expectation that our suppliers will avoid human rights violations.

MUFG's published Environmental and Social Policy Framework sets out MUFG's approach to managing the environmental and social risks arising from the business activities of the Group. The Framework explicitly prohibits the Group and its core subsidiaries (including MUS(EMEA)) from entering into any transaction involving the use of child or forced labour. The Framework is regularly reviewed and updated

where appropriate to support expectations laid out in the Code of Conduct and group policy statements, including the Human Rights Policy Statement.

MUS(EMEA) has a risk assessment process to identify and assess risks related to slavery reviewed and completed annually.

MUS(EMEA) takes steps to mitigate the risk of slavery and human trafficking in its business and supply chains and internally, through:

### **1. Customers**

A comprehensive financial crime framework, which includes adverse media checks of Customers both during onboarding and periodically. Adverse media checks include searches of corporate databases which highlight any regulatory, financial crimes and reputational concerns.

### **2. Supply Chain**

Seeking to partner with suppliers whose ethical principles align with our own, and expect them to operate fair and ethical workplaces.

A Know Your Supplier process, which monitors Country Risk taking into account both slavery and human trafficking considerations along with other supplier risk factors.

As part of MUS(EMEA)'s standard contracting policy, we place responsibility on our suppliers to manage their supply chain issues and to undertake due diligence across their supply chain to identify and manage slavery and human trafficking risks. We define the expectations to manage risks within our supply chain as part of our Supplier Code of Conduct, which is issued during the contracting and ordering processes with all new and existing suppliers.

To further reduce the risk in our supply chain we have implemented a new vendor risk assessment process in 2023 which provides enhanced due diligence and monitoring of our third parties.

### **3. Employees**

Our Human Resources policies that aim to create a working environment that is based on core values of respect, fairness, collaboration, team work, support, trust and transparency;

Our Whistleblowing and grievance procedures, through which employees can escalate any concerns relating to slavery or human trafficking; and

Our comprehensive financial crime framework identifies and mitigates financial crimes risks, recognising that slavery and human trafficking is a precursor to money laundering activity.

## **Employment Practices**

Through MUFG's Code of Conduct, internal policies (including employment and compliance) and through our employee networks and corporate social responsibility activities, we ensure that we do not condone or support any forms of bullying or harassment, and we continue to be committed to embracing diversity and building an inclusive culture where all employees are valued, respected and their opinions count.

We make our employment decisions in a non-discriminatory manner in accordance with our obligations under the law and in line with the national living wage.

### **Training and Whistleblowing**

Regular Financial Crimes training and Code of Conduct training are provided for all staff globally. In the all staff e-Learning module on AML Training rolled out in July 2023, content on human trafficking was included. The latest version of the instructor-led training rolled-out to AML investigators also included dedicated content around human trafficking awareness, red flags and a case study.

It is recognised that Supplier Relationship Managers play a particularly crucial role in this area and, as a result, will be issued some more detailed guidance with regard to the controls in place for the supplier onboarding process in the coming year.

In addition, the Whistleblowing policy and process are applied across all of our operations, and the Whistleblowing arrangements are clearly signposted to all staff.

### **Senior Management**

MUS(EMEA)'s senior management continues to fully recognise that slavery and human trafficking are issues of global importance and scale. Where the processes and controls we have implemented identify an unacceptable level of risk of modern slavery or human trafficking we are committed to taking action, including ending those relationships.

This statement has been approved by the Board of Directors of MUS(EMEA).

Signed by



**Chris Kyle**

Chief Executive Officer

MUFG Securities EMEA plc

Date: 31 May 2024