

# SUMITOMO MITSUI TRUST BANK, LIMITED MODERN SLAVERY ACT 2015

## ANNUAL SLAVERY AND HUMAN TRAFFICKING STATEMENT

## 1. INTRODUCTION

- 1.1 Sumitomo Mitsui Trust Bank, Limited (the "Bank") is committed to continuously improving its practices and controls to combat modern slavery and human trafficking, in alignment with the Modern Slavery Act 2015 of the United Kingdom (the "Act").
- 1.2 The Bank acknowledges the importance of working with employees, suppliers, and other stakeholders on an on-going basis to identify and address any salient risk areas within business activities and supply chains.

## 2. OUR BUSINESS

- The Bank is the principal operating subsidiary of Sumitomo Mitsui Trust Group, Inc. (the "Group"), a Japanese financial holding company headquartered in Tokyo.
- 2.2 In the United Kingdom, the Bank operates through its London Branch, which engages in financial market activities such as derivatives and foreign exchange, as well as project finance and lending related to shipping, aviation, real estate, and corporate finance.

# 3. SUPPLY CHAINS

- 3.1 The Bank has assessed its supply chains in Japan (for Head Office) and the United Kingdom (for the London Branch), focusing on companies that provide essential services and goods, and may involve human resources in their operations. These suppliers primarily consist of professional service providers and premises-related vendors registered and operating within Japan and the UK (collectively, the "Suppliers").
- 3.2 The Bank has determined that it does not maintain relationships with Suppliers located in countries identified as high-risk for slavery and human trafficking. The Bank recognises the importance of these issues and is committed to reviewing and enhancing its procurement practices to protect against modern slavery and human trafficking violations.



## 4. POLICIES ON SLAVERY AND HUMAN TRAFFICKING

- 4.1 The Bank, as part of the Group, supports global frameworks for corporate sustainability. The Group is a signatory to the United Nations Global Compact, and the Bank adheres to the Equator Principles. Additionally, the Group endorses the "Principles for Financial Action towards a Sustainable Society," a set of voluntary guidelines established by Japan's major financial institutions.
- 4.2 The Bank will make efforts to get its Suppliers to understand our approach to respect human rights. Internal controls have been introduced to assess potential risks of slavery and human trafficking associated with services provided by Suppliers. These assessments are conducted through desk-based research processes at the time of contract execution and renewal or expense payment.

## 5. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

- 5.1 The Bank has implemented the following due diligence processes to address slavery and human trafficking risks:
- -Risk Identification and Assessment: The Bank conducts assessments of its Suppliers to identify and evaluate risks of modern slavery, human trafficking, forced labor, child labor, and servitude in the supply chain through desk-based research processes at the time of contract execution and renewal or expense payment.
- -Risk Mitigation: The Bank's Human Resources Department provides annual training to executives and employees to raise awareness of human rights issues.
- -Whistleblowing System: The Bank maintains policies and procedures that allow employees to confidentially report concerns, including matters related to unfair labor practices, without using the standard reporting line.

## 6. TRAINING

6.1 The Bank provides training programs to its executives and employees to promote a deeper understanding of human rights, modern slavery, and human trafficking risks in business operations and supply chains. In addition, the London Branch offers specific training to its staff to enhance their understanding of the Act and its implications.



# 7. ONGOING REVIEW

7.1 The Bank monitors its human rights initiatives through its annual Human Rights Due Diligence Liaison Committee. This committee identifies significant human rights risks and considers measures to improve prevention and mitigation efforts.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Bank's slavery and human trafficking statement for the financial year ending 31 March 2025. It was approved by the Bank's Board of Directors on 29 September 2025 and signed on behalf of the Board by Yuki Takada Director, on 29 September 2025.

Yuki Takada

Yuki Takada

Director

SUMITOMO MITSUI TRUST BANK, LIMITED