To:	All members, warehouse companies and their London agents
Ref:	25/063
Classification:	Disciplinary
Date:	1 April 2025
Subject:	**DISCIPLINARY ACTION: ACCESS WORLD VLISSINGEN B.V.**

Summary

1. This Notice records the settlement of a disciplinary action brought by the LME against Access World Vlissingen B.V. (**"Access World"**) which includes a financial penalty of £60,000.

2. Terms not defined in this Notice have the same meaning given to them in the terms and conditions of the warehouse agreement (the **"Warehouse Agreement"**).

Background

3. Following an investigation (the **"Investigation"**)[1] by the LME, the Enforcement Committee of the LME instructed that disciplinary proceedings be instituted against Access World in respect of breaches of the Warehouse Agreement.

4. The Acts of Misconduct alleged against Access World arise from breaches of the following clauses of the Warehouse Agreement:

   a) Clause 11.1; and
   b) Clause 11.11.

5. Between 18 October 2022 and 16 November 2022 four Warrants of full plate nickel cathodes were erroneously loaded out of Warehouse Italy, a shed in Access World's Rotterdam operation[2] (the **"Incidents"**). The Incidents were discovered by a third party that was commissioned by Access World (pursuant to clause 7.4.1(ii) of the Warehouse Agreement) to conduct an independent audit and undertake a stock count of metal that was under Warrant in Warehouse Italy.

6. The Incidents were identified in a report produced by the independent third party (the **"Report"**) for Access World. Whilst the Incidents occurred on 18 October 2022 and 16 November 2022, the LME was not informed about them until it received the Report from Access World on 14 March 2023 – approximately five months after the Incidents had occurred.

[1] The Investigation also considered the controls that Access World had in place in respect of metal stored on Warrant in its Authorised Warehouses. The LME has determined that these were, at the relevant time, comparable to peers and reasonable. The LME is also satisfied that Access World has taken appropriate steps to comply with the Bagged Nickel Operating Procedure which the LME sent to all listed warehouse companies in May 2023.

[2] The Warehouse Italy shed was delisted by the LME on 18 April 2024 pursuant to Notice 24/173.

7. During the Investigation, Access World explained to the LME that the Incidents were caused by human error and it has taken remedial measures to minimise the risk of instances similar to the Incidents from re-occurring.

Settlement

8. Prior to the institution of disciplinary proceedings, the LME and Access World agreed a settlement in which Access World agreed to pay a financial penalty of £60,000.

9. In agreeing the settlement, the LME took account of the following:

   a) Access World was open and co-operative during the Investigation;

   b) The Incidents appeared to be the result of human errors; and

   c) Access World has taken remedial steps to minimise the risk of instances similar to the Incidents from re-occurring.

Adherence to the Warehouse Agreement

10. The LME reminds Warehouses that they must keep the Exchange promptly informed of any information concerning Underlying Metal that they store and which the Exchange expects to be disclosed to it, including (but not limited to) the erroneous load-out of Warrants. Failure to promptly notify the LME of such matters could impact the accuracy of the information that the Exchange publishes, such as the daily stock reports, and which could, in turn adversely impact the orderly running of the market.

Susan Small
General Counsel & Head of Enforcement

cc: Board directors