

**Slavery and Human Trafficking Statement**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”). It has been approved by the board of Marubeni Europe plc and constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> March 2016.

***Our company***

Marubeni Europe plc (the “Company”) is a wholly-owned subsidiary of Marubeni Corporation, one of Japan’s largest trading and investment companies. The Company is headquartered in London with branches in Germany, France and Italy and liaison offices in Spain and the UK.

The Company is engaged in trade and investment activities across a number of sectors and handles a broad range of industrial, agricultural and consumer goods and commodities.

Our main product areas include food ingredients and products, chemicals, garments and accessories, rubber products, pulp and paper, non-woven materials and machinery. We also invest and participate in projects such as power plants, industrial plants and infrastructure projects.

The Company’s organisation consists of 10 Business Units, which carry out business across the European market and worldwide. For more information on our business activities, please refer to <http://europe.marubeni.com/>.

***Our principles and values***

It is the Company’s policy that management and employees must comply with the highest standards of business and ethical conduct in all dealings with customers, suppliers, government officials and the wider community.

The Company’s core values, in common with all companies in the Marubeni Group, are fairness, innovation and harmony.

***Our supply chains***

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

Given the wide-ranging nature of the Company’s business, the composition and complexity of our supply chains vary greatly. We have estimated that we source

goods from in excess of 60 countries. The total number is even higher when considering services.

### ***Relevant policies***

The meaning of modern slavery and the Company's commitment to the fight against modern slavery are expressed in our Modern Slavery Policy, accessible on our website at <http://europe.marubeni.com/policies/>.

The Company 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.

We would also draw attention to the Basic Supply Chain CSR Policy of our parent company Marubeni Corporation, established in October 2008 (and subsequently amended), as referred to in section 4 of our Modern Slavery Policy.

Other relevant policies of the Company are its Anti-Corruption Policy and its Business Conduct Policy.

### ***The modern slavery risk***

Our Modern Slavery Policy is a first step towards the Company 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.

We recognise 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 the Company must therefore be at risk in respect of modern slavery to some extent.

Whilst we have no information to suggest that modern slavery exists in any of our supply chains, our initial analysis suggests that certain businesses or product lines may represent a higher degree of risk, and accordingly may require more detailed analysis and investigation. We have also identified certain parts of our business that are seasonal and that may accordingly represent an increased risk of modern slavery.

Our next step is to deepen our understanding of the risks mentioned above (and any other risks that we identify) and then determine, based on the severity of the risk and the influence we may have in the relevant supply chains, an efficient and effective manner for carrying out due diligence proportionate to the identified risk.

In respect of business partnership risk, it is worth noting that we have established many long-standing relationships with suppliers and we consider that in many cases such long-term partnerships will involve less risk because each of us should have a better knowledge and understanding of each other's operations and policies.

***Other specific steps already taken***

- We appointed external advisors to:
  - inform our understanding of modern slavery;
  - advise us in respect of our compliance with the Act;
  - produce a guidance note on the provisions of the Act; and
  - train a number of key executives on the requirements of the Act.
- Having already circulated the guidance note to our managers, in the summer of 2016 all of our staff received internal training in relation to modern slavery.
- We are currently in the process of sending our Modern Slavery Policy to all of our recent suppliers.
- Further, having updated our standard terms of sale and our standard terms of purchase prior to issuing this Statement, where such terms have been incorporated into the related contract and depending on the circumstances, we have the ability to take appropriate contractual action (such as terminating or suspending the business) where we have a reasonable belief that modern slavery is occurring in the business or supply chain of the particular supplier.

***Performance indicators***

*In driving the performance of the business*

Individual contracts very often contain performance and delivery conditions. However, our initial review would suggest that we have 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*

Our aim is to send our Modern Slavery Policy to 100% of our recent suppliers, as indicated above.

We have already trained all our staff on modern slavery, and we aim to similarly train new key managers on an ongoing basis.



***Internal organisation in relation to modern slavery***

We have set up a dedicated task force which consists of representatives from the following departments: HR, Legal, Corporate Planning, Risk Management and Accounting. The task force reports to the Chief Financial & Administrative Officer who has overall responsibility for the Company's response to the challenge of slavery and human trafficking and, in accordance with the requirements of the Act, has signed this Statement below.

***Effectiveness***

It is too early to say with any certainty how effective the steps we are taking have been and will be in ensuring that modern slavery is not taking place in our business or supply chains. As part of our work for the next financial year we will consider how best to monitor the effectiveness of the actions taken.

This Statement relates to the Company's financial year ended 31 March 2016 and, where noted, steps taken subsequently up to the date shown below.

Signed:



Takanori Tanaka  
Director & CFAO  
Marubeni Europe plc

Date: 30/09/2016