

MARUBENI EUROPE PLC

Policy No.907

Modern Slavery Policy

GM in charge: General Managers of HR & Administration Team, Corporate Planning Team and Legal Team

Date of issue: 31 August 2016

Last amended: 2 December 2019

Modern Slavery Policy

Introduction

1. Modern slavery is a fundamental violation of basic human rights and a crime. It takes various forms including slavery, servitude, forced or compulsory labour and human trafficking. These offences are closely related but legally distinct:
 - (a) slavery is where ownership is exercised over a person;
 - (b) servitude involves the obligation to provide services imposed by coercion;
 - (c) forced or compulsory labour involves work or service exacted from any person under the menace of a penalty and for which the person has not offered himself or herself voluntarily; and
 - (d) human trafficking involves arranging or facilitating the travel of another with a view to exploiting them.

While recognising the important differences between these offences, for the remainder of this Policy the collective description of “modern slavery” is used to describe any or all of them.

2. In all cases, some of the most vulnerable people in society are stripped of their dignity and basic freedoms, and forced to work for someone else’s gain or benefit. The most common forms of modern slavery are sexual exploitation and labour exploitation including child labour and domestic servitude.

Purpose of this Policy

3. This Policy expresses the Company's commitment to the fight against modern slavery. The specific steps taken by the Company on an annual basis in the implementation of this Policy are recorded in the Company's annual Slavery and Human Trafficking Statement, published in accordance with the requirements of the Modern Slavery Act 2015.
4. For information only, we refer to the Basic Supply Chain Sustainability Policy established in October 2008 by our parent company Marubeni Corporation (as subsequently amended) - https://www.marubeni.com/en/sustainability/supply_chain/. Further, in 2019 Marubeni Corporation published its Basic Policy on Human Rights based on the UN’s Guiding Principles on Business and Human Rights - https://www.marubeni.com/en/sustainability/human_rights/.

Policy statement

5. The Company is committed to taking steps where reasonably practicable to ensure that modern slavery is not taking place:
 - (a) in any part of its own business; and
 - (b) in any of its supply chains.
6. The Company expects all of its employees, officers and directors (“members of staff”) to try to ensure that they are in no way connected with modern slavery either through the commission of a criminal offence or through actions or omissions that might bring themselves and/or the Company into disrepute.
7. Although it is not practical to have a direct relationship with all links in our supply chains and although we do not have the ability to control the conduct of such individuals and organisations,

the Company has the same expectations of its contractors, suppliers and other business partners as are set out in section 6 above.

8. The Company will from time to time assess and review the risk that modern slavery may be occurring in any part of its own business and in any of its supply chains. In light of any such risk assessments it may from time to time seek specific and further reassurances from its contractors, suppliers and other business partners; and seek to carry out or procure due diligence or specific audits either itself or through group companies or third parties to satisfy itself that modern slavery is not occurring.
9. Where possible we build long standing relationships with contractors, suppliers and other business partners and make clear our expectations of business behaviour. This helps to reduce the risk of modern slavery.
10. The Company is committed to transparency in its approach to tackling modern slavery consistent with its disclosure obligations under section 54 of the Modern Slavery Act 2015.

Application of this Policy

11. This Policy applies to all members of staff.
12. All members of staff are expected to:
 - (a) read, understand and, so far as reasonably possible, work with the Company to assist with the aims of this Policy; and
 - (b) raise concerns at the earliest possible opportunity with their manager or in the manner set out in section 27 of the Company's Business Conduct Policy about any suspicion that modern slavery might be occurring in any part of the Company's business or in any of the Company's supply chains.
13. Persons who are not members of staff of the Company are equally encouraged to raise any concern, issue or suspicion of modern slavery in any part of our business or in any of the Company's supply chains, by contacting the Company using the following link: <https://europe.marubeni.com/contact-us/>.
14. The Company wishes to encourage openness and will support anyone who raises a genuine concern that modern slavery might be taking place in any part of the Company's business or in any of the Company's supply chains, even if that concern ultimately turns out to be mistaken.

Responsibility for this Policy

15. The Company's board of directors has overall responsibility for this Policy, including ensuring that it complies with legal and ethical obligations.
16. The Compliance Officer is primarily responsible for the day-to-day implementation of this Policy including monitoring its effectiveness and ensuring that all members of staff are aware of and understand this Policy.
17. All members of staff are responsible for following this Policy to the extent that it affects their day-to-day work and in particular in respect of the reporting requirements.
18. The Compliance Officer welcomes any questions or comments on this Policy and suggestions for ways in which it or procedures relating to the eradication of modern slavery might be adopted, adapted or improved.

Sanctions

19. This Policy is not designed to be contractual in respect of members of staff. Any breach of this Policy by any member of staff that is deemed by the Company to be wilful or negligent, including in respect of his or her responsibilities, shall be investigated. Any remedial action that ensues will be taken in accordance with the Company's disciplinary processes. If, after investigation and due process, a breach is deemed by the Company to be very serious, it could lead to sanction, up to and including summary dismissal.
20. In the event that the Company has a reasonable belief that modern slavery is occurring in the business or supply chains of any contractors, suppliers and other business partners, the Company:
 - (a) will expect the relevant contractor, supplier or other business partner:
 - (i) to be fully cooperative and transparent and supply such information as the Company may reasonably request in relation to the issue;
 - (ii) to put in place remedial action as soon as reasonably practical with a view to ensuring that such modern slavery ceases to occur and that the victims of that modern slavery are appropriately safeguarded; and
 - (iii) to monitor the effectiveness of the remedial action taken including the actions taken to safeguard the victims; and
 - (iv) to report to the Company at reasonable intervals on the effectiveness of that remedial action and safeguarding and any further steps taken to ensure that such modern slavery ceases to occur;
 - (b) may, depending on the circumstances and the terms of the contract with the relevant contractor, supplier or other business partner, terminate or suspend the relationship or otherwise cease, reduce or minimise business contact with the relevant contractor, supplier or other business partner.
21. In the event that the Company has a reasonable belief that modern slavery is occurring in any part of its own business or its supply chains the Company will:
 - (a) as soon as reasonably practical and so far as is reasonably possible, put in place or recommend remedial action with a view to ensuring that such modern slavery ceases to occur and that the victims of that modern slavery are appropriately safeguarded;
 - (b) monitor the effectiveness of the remedial action taken; and
 - (c) as appropriate, deal with the matter under its disciplinary procedures (see section 19 above).

Training

22. Existing members of staff have received training to assist them in being able to identify modern slavery and to understand the contents and purpose of this Policy and the Company's procedures relating to combating modern slavery. On an ongoing basis, new members of staff in the Company's larger offices will receive similar training.
23. The Company expects its contractors, suppliers and other business partners to provide appropriate training to their members of staff and, if and when requested, evidence that they have done so.

Amendments to this Policy

24. This Policy expresses the will of the Company and its commitment to the issues addressed. This Policy may be amended by the Company at its discretion at any time.
25. This Policy will be reviewed by the Company's board of directors on a regular basis, usually at the same time as the board reviews the Company's annual Slavery and Human Trafficking Statement.