

## **Slavery and Human Trafficking Statement (FY2021)**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”).

It has been approved by the boards of each of Marubeni Europe plc and Marubeni International (Europe) GmbH (together the “Companies”) and constitutes the Companies’ joint slavery and human trafficking statement for the financial year ended 31 March 2022 (“FY2021”).

### ***Our companies***

Marubeni Europe plc, a wholly owned subsidiary of Marubeni Corporation, one of Japan’s largest trading and investment companies, is headquartered in London with an office in Risley, UK.

Marubeni International (Europe) GmbH, a wholly owned subsidiary of Marubeni Europe plc, is headquartered in Germany and has branches in France, Italy and the UK.

The Companies are engaged in trade and investment activities across a number of sectors and handle a broad range of goods and commodities.

The Companies’ main product areas include food products and ingredients, chemicals, garments and accessories, pulp and paper, non-woven materials and machinery. The Companies are also involved in other sectors, such as renewable energy, infrastructure, aerospace and maritime business.

Our organisation consists of 14 Business Units, which carry out business primarily in Europe. For more information on our business organisation and activities, please refer to <http://europe.marubeni.com>.

### ***Our principles and values***

It is the Companies’ 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 Companies’ core values, in common with all companies in the Marubeni Group, are fairness, innovation and harmony.

### ***Our supply chains***

The Companies each act as an intermediary and facilitator for trade within Europe and between Europe and Japan or other third countries (import, export and offshore trade).

The Companies may sell products directly to the customer (B2B) or through a distributor network. The Companies also provide services including finance and logistics. Further, the Companies are engaged in business investment, project development and management.

Given the wide-ranging nature of the Companies' business, the composition and complexity of the Companies' supply chains vary greatly. We have estimated that we source goods from in excess of 60 countries. When considering services as well, the total is even higher.

### *Relevant policies*

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

Our respective standard terms of sale and standard terms of purchase require our counterparties to comply with our policies, including our respective Modern Slavery Policies. This enables us, where such terms have been incorporated into the related contract and depending on the circumstances, 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.

The Companies are committed to taking steps where reasonably practicable to ensure that modern slavery is not taking place in any part of their own business or in any of their supply chains.

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

Marubeni has also declared its support for the UN Global Compact (UNGC), an international initiative advocated by the United Nations which specifies ten principles to be observed by companies in four fields, namely, human rights, labour, environment and anti-corruption.

In 2019, Marubeni Corporation published the Basic Policy on Human Rights which sets out our firm commitments based on the UN's Guiding Principles on Business and Human Rights.

Other relevant policies of the Companies are the Anti-Corruption Policies and Business Conduct Policies.



***The modern slavery risk***

The Companies 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 Companies must therefore be at risk in respect of modern slavery to some extent.

Furthermore, we recognise that the continuing COVID-19 pandemic and its economic effects may increase the risk of modern slavery in some sectors.

Although the war in Ukraine has not had a direct impact on the Companies' operations, we believe that the repercussions of the war could lead to a heightened risk of modern slavery in some sectors.

***Reducing the risk of modern slavery occurring in our business or supply chains***

In line with guidelines issued by Marubeni Corporation, Marubeni Europe plc established a methodology for the assessment of risk of human rights violations in its supply chains. The first step, which was completed during FY2017, was for all Business Units to review their supply chains against the US Department of Labor's (DoL) "List of Goods Produced by Child Labor or Forced Labor" and report their findings to the Corporate Planning department.

Through this process individual supply chains involving a commodity or any of the countries listed by the DoL were identified as potentially representing a higher risk of modern slavery. These were found to be related mainly to the Food and Lifestyle Business Units.

Since this review supply chains are screened regularly using a leading third-party risk database screening service which provides daily updates.

***Other specific steps taken***

Marubeni Europe plc has visited suppliers together with Marubeni Corporation to conduct a sustainability survey covering human rights, working practices and conditions of employment, as well as environmental issues. A summary report was published by Marubeni Corporation on its website.

Such visits have the potential to be beneficial for several reasons. Firstly, it is an opportunity to highlight our commitments to sustainability based on Marubeni Group Policies and our expectations of suppliers. Secondly, we can advise on any concerns arising from the site inspections. Thirdly, we can engage directly with our suppliers on various matters and improve our understanding of local issues.

During FY2019, Marubeni Europe plc contacted suppliers to inform them of the new Basic Policy on Human Rights and revised Modern Slavery Policy and Basic Supply Chain Sustainability Policy.

In FY2020, the Companies requested some direct suppliers to complete a questionnaire. During FY2021 we followed up on some of the responses received, for example, to seek further information on direct suppliers' policies (including hiring policies). In certain instances we provided suggestions on areas of improvement regarding direct suppliers' policies to try to align these, where possible, with our own.

We plan to examine our internal processes with a view to identifying further steps which could be taken in order to manage the risk of modern slavery in our supply chains.

### *Training and education*

Following a review of our internal training we established a regular programme to increase awareness of the risk of modern slavery, warning signs and steps to mitigate risk. Training is given to all new staff as part of the induction process.

During FY2020, Marubeni Europe plc carried out further training for all employees of both entities. Prior to this the staff involved in conducting training received relevant external training. The revised training was also provided to new staff in FY2021.

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

Matters are overseen by the appropriate company directors and the managers in the Legal and the Corporate Planning departments. The assigned directors have overall responsibility for the Companies' joint response to the challenge of slavery and human trafficking and, in accordance with the requirements of the Act, and have signed this Statement below.

### *Effectiveness*

It is difficult to judge the effectiveness of the steps we have taken in ensuring that modern slavery is not taking place in our business or supply chains. However, as a result of these measures, we are confident that the risks are now much better understood.

The continuation of the supply chain screening which began in FY2017 increases our awareness of potential infringements or incidents relating to labour laws and workplace conditions. Moreover, the commencement of higher risk sector supplier visits (FY2018), questionnaires (FY2020) and follow-up to the questionnaires (FY2021) increases our level of engagement with suppliers on modern slavery and human rights issues.



Additionally, the revised staff training (FY2020 and FY2021) ensures that our employees have a good understanding of modern slavery. Through this training staff are also reminded of relevant company and group policies and actions taken in this area. Furthermore, staff are urged to communicate any related concerns to management.

This Statement relates to the Companies' financial years ended 31 March 2022 and, where noted, steps taken subsequently up to the date shown below.

Signed:



Tetsuya Ishida  
Director & CFAO  
Marubeni Europe plc

Date: 20/09/2022



Shigetaka Natsukuri  
Managing Director  
Marubeni International (Europe) GmbH

Date: 20 September 2022