Marubeni

Marubeni Europe plc
Marubeni International (Europe) GmbH

Slavery and Human Trafficking Statement (FY2025)

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 2026 ("FY2025").

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.

Organisation structure and product areas

Marubeni Europe plc, a wholly owned subsidiary of Marubeni Corporation, one of Japan's largest trading and investment companies, is headquartered in London with a branch 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 main product areas include food products, chemicals, garments and accessories, pulp and paper, non-woven materials, machinery and equipment. The Companies are also involved in other sectors, such as renewable energy, infrastructure, aerospace and maritime business.

Our organisation consists of 8 Business Units, which operate primarily in Europe. For more information on our business organisation and activities, please refer to http://europe.marubeni.com.

Internal organisation in relation to modern slavery

Matters relating to modern slavery are overseen by the appropriate company directors and the managers in the Legal and the Coordination & Administration 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, have signed this Statement below.

Our supply chains

The Companies act as intermediaries and facilitators for trade within Europe and between Europe and Japan or other third countries (import, export and offshore trade).

They may sell products directly (mainly 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 our 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.

Policies in relation to modern slavery and human trafficking

The Companies' commitment to the fight against modern slavery is set out in our respective Modern Slavery Policies, accessible at http://europe.marubeni.com/policies.

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

Our respective standard terms of sale and 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 suspending or terminating the business) where we have a reasonable belief that modern slavery is occurring in the business or supply chain of a particular supplier.

Marubeni has 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 the fields of human rights, labour, environment and anti-corruption.

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.

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 are the Companies' Anti-Corruption Policies and Business Conduct Policies.

Assessing and managing 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 effects of the COVID-19 pandemic and conflicts such as the war in Ukraine may have increased the risk of modern slavery in some sectors.

Some of the inherent modern slavery risk factors present in the Companies' supply chains may include labour-intensive production and seasonal labour.

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.

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

Subsequent to this review, screening of suppliers related to these supply chains has been conducted regularly using a leading third-party risk database screening service which provides daily notifications. If any adverse results are identified, escalation steps are initiated, including supplier engagement where necessary.

In addition to daily automated screening, emerging risks that may impact supply chains are also monitored, including geopolitical developments and climate-related disruptions.

Looking ahead to FY2026, we will explore ways to strengthen our approach to managing modern slavery risks. This may include reviewing enhancements to risk mapping tools.

Due diligence process

New suppliers are subject to an onboarding process. During this process, if any issues are identified, further steps are initiated. These may include engagement with the supplier to seek clarification, obtaining a written explanation, and applying further

scrutiny.

Where issues or non-compliance are identified, appropriate remediation measures will be implemented. Should the risks remain unresolved or unacceptable following remediation efforts, the business relationship may be discontinued.

Other specific steps taken

In 2019 Marubeni Europe plc visited certain 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.

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 for improvement to try to align these policies, where possible, with our own.

During FY2022, the Companies contacted suppliers to highlight the Marubeni Group's Basic Policy on Human Rights and Basic Supply Chain Sustainability Policy.

During FY2024, human rights due diligence was carried out with regard to certain food product suppliers, common to both Marubeni Corporation and Marubeni Europe plc.

During FY2025, the Companies re-engaged with suppliers to reinforce Marubeni Group's commitment to sustainability. This included reiterating key policies such as the Basic Policy on Human Rights and Basic Supply Chain Sustainability Policy. In addition, the Companies shared Marubeni's "Our Journey" publication to further emphasise the Group's approach to responsible business practices and sustainable supply chain management. In total 585 suppliers and business partners were contacted in FY2025.

We continue 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 on modern slavery

We have established a regular programme of training to increase awareness of the risk of modern slavery, warning signs and steps to mitigate risk. Furthermore, all new staff receive training as part of the induction process.

During FY2020, Marubeni Europe plc carried out enhanced training for all employees of both entities, which was repeated for new staff in FY2021. Prior to this the staff involved in delivering the training received relevant external training.

In FY2024, Marubeni Europe plc conducted in-person training sessions for management and staff at all levels, to enhance the understanding of modern slavery throughout the organisation.

In conjunction with this training, an e-learning module was developed and rolled out to all staff, together with a quiz based on the subject material, to assess the level of understanding of the risks of modern slavery across the organisation. In FY2024, 179 staff took part in the quiz with an average score of 93%, reflecting a strong understanding of the topic.

Both the in-person training and the e-learning included key information such as the definition and categories of modern slavery, risk areas, how to report concerns safely and confidently, and the Companies' approach to combatting modern slavery.
In FY2025, a new e-learning module was created, covering recent developments in the UK and internationally, as well as relevant case studies to support learning and awareness. A total of 146 employees completed the training, with participants achieving an average quiz score of 95.7%.

Monitoring and evaluation

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 better understood.

We are able to assess the effectiveness of training initiatives by monitoring attendance and quiz scores. This also helps us to identify areas for further development.

The continuation of 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), follow-up to the questionnaires (FY2021), and highlighting to suppliers our supply chain and human rights policies (FY2022 and FY2025), increases our level of engagement with suppliers on modern slavery and human rights issues.

Additionally, regular training 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 2026 and, where noted, steps taken subsequently up to the date shown below.

Marubeni
Marubeni Europe plc
Marubeni International (Europe) GmbH

Signed:

Keisuke Ishii
Director & CFAO
Marubeni Europe plc

Date: 17th July 2026

Hiroki Shinoda
Managing Director
Marubeni International (Europe) GmbH

Date: 17/07/2026