

Slavery and Human Trafficking Statement (FY2018)

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 31st March 2019 (“FY2018”).

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 a liaison office in the UK.

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

Our main product areas include food ingredients and products, chemicals, garments and accessories, 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 12 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 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>.

Our standard terms of sale and standard terms of purchase require our counterparties to comply with our policies, including our Modern Slavery Policy. 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 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 Sustainability Policy, established in October 2008 (and subsequently amended), as referred to in section 4 of our Modern Slavery Policy and found here: www.marubeni.com/en/sustainability/supply_chain/.

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 for Human Rights which sets out our firm commitments based on the UN's Guiding Principles on Business and Human Rights. This policy can be found here: www.marubeni.com/en/sustainability/human_rights/.

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

Further to the above policies, in April 2019 the Marubeni Corporation established the Sustainability Management Department.

The modern slavery risk

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.

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

In line with guidelines issued by Marubeni Corporation, the Company established a methodology for the assessment of risk of human rights violations in our 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 "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 we continue to screen these supply chains regularly using a leading third-party risk database screening service which provides daily updates.

As a next step we will be sending questionnaires to some suppliers in order to improve our understanding of modern slavery risks in our supply chains.

Other specific steps taken

Following the supply chain review, in FY2018 the Company, jointly with Marubeni Corporation, visited two suppliers to conduct a sustainability survey covering human rights, working practices and conditions of employment, as well as environmental issues.

These 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, the Company 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.

A summary report of these inspections has been published by Marubeni Corporation here: https://www.marubeni.com/en/sustainability/supply_chain/survey/.

Training and education

Following a review of our internal training we have established a regular programme so that awareness within the Company of the risk of modern slavery, warning signs and steps to mitigate risk can be increased. Training is now given to all new staff as part of the induction process in London head office and we plan to extend this to our branches soon.

Internal organisation in relation to modern slavery

Matters are managed by the Chief Financial & Administrative Officer ("CFAO") and the managers in the Legal and the Corporate Planning departments. The CFAO 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. However, as a result of the steps taken so far, 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 increases our level of engagement with suppliers on modern slavery and human rights issues.

This Statement relates to the Company's financial year ended 31 March 2019 and, where noted, steps taken subsequently up to the date shown below.

Signed:



Shuichi Kamizono
Director & CFAO
Marubeni Europe plc

Date: 24 / Sep / 2019