

## ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT

## 1. Introduction

This statement sets out the measures Mitsui & Co. Europe Plc ("Mitsui Europe") has taken to ensure slavery and human trafficking is not taking place within our organisation or our supply chains. This statement is made pursuant to the UK's Modern Slavery Act 2015 (the "Modern Slavery Act").

# 2. Organisation

Mitsui Europe is a company incorporated under the laws of England and Wales. It is headquartered at the 8th and 9th Floors, 1 St. Martin's Le Grand, London EC1A 4AS, the UK. Mitsui Europe has subsidiaries incorporated in the UK, Germany, Belgium, Italy, Norway and Russia.

For more information on our organisation, please visit the following link: <a href="https://www.mitsui.com/eu/en/index.html">https://www.mitsui.com/eu/en/index.html</a>.

Mitsui Europe is a wholly owned subsidiary of Mitsui & Co. Ltd ("Mitsui"), headquartered in Japan. Mitsui is a publicly listed company that has been a participant in the United Nations Global Compact (the "Global Compact") since 2004. Mitsui has been and is a member of the Global Compact Network Japan, and Mitsui continually strives to comply with the Global Compact principles as part of its own corporate guidelines, including Principle 4 (the elimination of all forms of forced and compulsory labour) and the promotion of SDG target 8.7. Currently, Mitsui conducts a group-wide survey every other year in order to check compliance with the Global Compact principles and is working to comply with and to put into practice those principles on a global group basis, including Mitsui Europe. For more details, please refer to the Mitsui Website.

## 3. Our Business

Our business is wide ranging and includes activity from product sales, worldwide logistics and financing through to the development of major international infrastructure and other projects in the following fields: Iron & Steel Products, Mineral & Metal Resources, Infrastructure Projects, Mobility Business, Chemicals, Energy, Food & Retail Business and Innovation & Corporate Development.

Our annual consolidated turnover for the financial year ended 31 March 2019 was above

the £36M threshold specified in the Modern Slavery Act.

For more information on our business, please visit the following link: https://www.mitsui.com/eu/en/business/index.html.

#### 4. Our Supply chains

Mitsui Europe is engaged in the trading of, amongst others, chemicals and food as well as steel products and acts as an intermediary and facilitator for other products traded within Europe, between Europe and Japan and amongst other third countries. Mitsui Europe is also engaged in business investment, project development and management.

In conducting business, Mitsui Europe is fully aware of its responsibilities, such as complying with laws, respecting human rights, maintaining safe and sanitary working conditions, giving comprehensive consideration to reduction of the environmental burden, and ensuring safety and consumer confidence.

For more details, please refer to "Promotion of Supply Chain Management" on Mitsui's Sustainability Report 2018 and "Respect for Human Rights" on Mitsui Website.

#### 5. Policies

Respect for human rights is stipulated in Mitsui's <u>"Basic CSR (Corporate Social</u> <u>Responsibility) Policy"</u> and Mitsui supports its group companies in the practice and implementation of its CSR policies. Mitsui's <u>Group Conduct Guidelines</u> "With Integrity" also state that "We will comply with laws and regulations, and act to the highest ethical standards. We will respect human rights".

Being a subsidiary of Mitsui, Mitsui Europe recognizes its responsibilities that surpass legal compliance with respect to its business activities and works to ensure the protection of human rights in its supply chains.

Mitsui Europe's Business Conduct Guidelines set out and highlight the importance of "Compliance with the Law and Respect for Human Rights" and set out compliance reporting policies and structure. They also refer to the Global Compact to remind all our staff members of the importance of understanding and complying with the Global Compact principles.

## 6. Measures

- Risk Assessment As a subsidiary of Mitsui, Mitsui Europe has proactively participated in Mitsui's group-wide survey in order to ascertain the degree of compliance with the Global Compact principles and other activities. This allows Mitsui to comply with and to put into practice those principles on a global group basis, as described in paragraph 2. Organisation.
- Whistleblowing We take this issue seriously and have a whistleblowing framework

in place to encourage staff to report any suspicions they may have, including where they believe our Business Conduct Guidelines have been breached.

 Workforce – Mitsui Europe designs its employment, recruitment and remuneration practices to ensure that they comply with the laws and regulations of the jurisdictions in which we operate.

# 7. Training

Staff awareness is a key measure in preventing slavery and human trafficking. Accordingly, we will review our training programme to our staff so that awareness can be increased.

## 8. Annual Review

This statement is produced in line with section 54 of the Modern Slavery Act and is for the financial year ended 31 March 2019. This Statement will be reviewed and updated annually.

The Board of Mitsui Europe approved this statement on 18 August 2019 and it is signed by our Managing Director, Yasuyuki Fujitani.

Yasuyuki Fujitani Managing Director Mitsui & Co. Europe Plc 19 August 2019