

Slavery and Human Trafficking Statement (FY2016)

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 2017 (“FY2016”).

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 liaison offices in Spain and the UK.

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

Our main product areas include food ingredients and products, chemicals, garments and accessories, rubber products, 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 11 Business Units, which carry out business across the European market and worldwide. For more information on our business 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>.

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 CSR Policy of our parent company Marubeni Corporation, established in October 2008 (and subsequently amended), as referred to in section 4 of our Modern Slavery Policy.

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

The modern slavery risk

Adopting the Modern Slavery Policy was a first step towards the Company having in place systems to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- monitor potential risk areas in our supply chains.

We recognised 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.

During FY2016 Marubeni Corporation distributed guidelines to relevant group companies to assist them in efforts towards the prevention of human rights violations in their own businesses and in their supply chains.

Having considered these guidelines the Company has established a methodology for the assessment of risk of human rights violations. The first step, to be completed during the financial year ending 31st March 2018, is for 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 to the steering committee (referred to on page 3).

If any of our individual supply chains are found to involve a commodity that is listed by the DOL or any of the listed countries feature in any part of the supply chain then we will evaluate these supply chains further, applying certain criteria where necessary to determine which should be accorded the highest priority.

Other specific steps already taken prior to 31 March 2017

- Having already circulated the guidance note to our managers, in the summer of 2016 all our staff received internal training in relation to modern slavery.
- We sent our Modern Slavery Policy to all of our recent suppliers.
- We updated our standard terms of sale and standard terms of purchase to enable 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.

Performance indicators

In driving the performance of the business

Individual contracts very often contain performance and delivery conditions. However, our initial review suggested that we had not established, in respect of any particular supply chain or business and whether for internal use or for our suppliers, any formal performance incentives or indicators of the type that may unintentionally increase pressure on those who are producing the goods to a level which might in turn create an environment where acceptable labour standards are compromised.

In respect of reducing the risk of modern slavery occurring in our business or supply chains

As noted above, we sent our Modern Slavery Policy to our recent suppliers.

Internal organisation in relation to modern slavery

We initially set up a dedicated task force consisting of representatives from the following departments: HR, Legal, Corporate Planning, Risk Management and Accounting. Matters are now managed by a steering committee comprising 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.

This Statement relates to the Company's financial year ended 31 March 2017 and, where noted, steps taken subsequently up to the date shown below.

Signed:



Takanori Tanaka
Director & CFAO
Marubeni Europe plc

Date: 27/09/2017