



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. Our 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: <https://www.mitsui.com/eu/en/index.html>.

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 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. 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 business areas: Iron & Steel Products, Mineral & Metal Resources, Machinery & Infrastructure, Chemicals, Energy, Lifestyle, and Innovation & Corporate Development.

Our annual consolidated turnover for the financial year ended 31 March 2023 (“FYE March 2023”) 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, food, and steel products, and acts as an intermediary and facilitator for other products traded within Europe and globally. Mitsui Europe is also directly or indirectly engaged in business investment, project development and management. We are therefore active at various stages of our supply chains, from upstream to downstream.

High-risk business areas identified through its human rights risk mapping process by Mitsui in FYE March 2020 are food, textiles, building materials and mining industry.

In conducting business, Mitsui Europe is fully aware of its responsibilities, such as complying with applicable 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. Mitsui Europe adheres to Mitsui's policies and approach. For more details, please refer to "[Supply Chain Management](#)", "[Human Rights](#)", "[Sustainability Report 2022](#)" on [Mitsui Website](#).

5. Our Policies and Guidelines

Business Conduct Guidelines

Mitsui Europe's Business Conduct Guidelines set out and highlight the importance of "Compliance with the Law and Respect for Human Rights" and put in place 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.

Mitsui Europe also adheres to the following Mitsui's policies and guidelines which apply on a global group basis. Mitsui supports Mitsui Europe and other group companies in the practice and implementation of these policies.

Sustainability Policy

This policy sets out Mitsui's group-wide basic approach to sustainability. It includes our commitment to regard sustainability initiatives as important management issues and to take on the challenge of addressing global issues and contributing to the realisation of a sustainable society and economic growth at the same time through our business activities.

Human Rights Policy

This policy sets out Mitsui's group-wide approach to human rights. It includes our commitment to operate our business with respect for human rights and our expectations for various stakeholders including our business partners to understand and respect human rights in the manner specified therein.

With Integrity - Mitsui's Group Conduct Guidelines

"With Integrity" includes requirements for employees to respect human rights and not to engage in discrimination of any kind. It also states that employees shall prevent human rights violations and collaborate with suppliers to ensure that they do not contribute to human rights violations, such as child labour or forced labour.

Sustainable Supply Chain Policy

This policy sets out Mitsui's expectations of our suppliers to respect human rights, including not to tolerate forced labour, bonded labour, human trafficking, child labour or any other form of modern slavery.

Procurement Policies for Specific Commodities (natural rubber, palm oil, timber, and paper products)

These policies set out Mitsui's group-wide approach to social risks such as violations of workers' rights and human rights of local communities as well as environmental risks such as deforestation for the procurement of natural rubber, palm oil, timber, and paper products (the "Goods"). They include Mitsui's commitment to "no deforestation" and "no exploitation" for the procurement of the Goods. They also set out Mitsui's expectations for our suppliers to respect human rights and cultures of indigenous people whereby our suppliers are requested to comply with all applicable laws and regulations as well as to respect relevant international standards such as [the United Nations Declaration on the Rights of Indigenous Peoples](#), [the Convention concerning Indigenous and Tribal Peoples in Independent Countries \(ILO Convention: C169\)](#), and [the principle of Free, Prior and Informed Consent \(FPIC\)](#).

Respecting Internationally Recognized Human Rights Standards

We are committed to respect human rights as contained, at a minimum, in the International Bill of Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

6. Our Approach

- Supplier Communication – When commencing business with a new supplier, formal written communication is sent to such supplier, requesting their understanding and cooperation to comply with Mitsui's group-wide [Sustainable Supply Chain Policy](#). This is reinforced by Mitsui's group-wide internal survey on the compliance to the process regularly.
- Whistleblowing – We take human rights 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.

- Training – Staff awareness is a key measure in preventing slavery and human trafficking.

In July 2022, “Sustainable Supply Chain Management Handbook” published by Mitsui was introduced to and the recordings of online webinars by Mitsui and an external lawyer were shared with members at all levels in Mitsui Europe and its subsidiaries. November 2022 was Mitsui’s group wide “With Integrity Month” where various initiatives such as management messages, executives’ interview, discussions, were announced to realise our vision of an organisation with integrity.

In March 2023, a workshop on Integrity and Psychological Safety was held to members at all levels in Mitsui Europe to understand our responsibility to value and practice integrity in our workplace and in business. Also, as a part of group wide sustainability month activities, group discussions on “sustainability and business” were open to everyone including employees of Mitsui Europe and its subsidiaries.

- Initiatives by Mitsui – As a subsidiary of Mitsui, Mitsui Europe proactively supports and cooperates Mitsui’s group-wide initiatives to ascertain the degree of compliance with the Global Compact principles and other activities including, but not limited to,
 - Supplier Questionnaire Surveys – regular questionnaire surveys on selected major suppliers who handle products in high-risk business domain.
 - Supplier Surveys – in-person interview with management and relevant members and on-site inspections of suppliers.
 - Internal Audits – internal audits on business divisions, corporate staff divisions, and offices including Mitsui Europe and its subsidiaries.
 - ESG impact assessments – new business investment is subject to ESG impact assessments which cover aspects such as human rights, pollution prevention, climate change, ecosystems and water stress.

We will continue to review our training programme for better awareness and compliance.

7. Annual Review

This statement is produced in line with section 54 of the Modern Slavery Act and is for FYE March 2023. This Statement will be reviewed and updated annually.

The Board of Mitsui Europe approved this statement on 26th September 2023, and it is signed by our Managing Director, Yukinobu Nakano.



Yukinobu Nakano
Managing Director
Mitsui & Co. Europe plc