FY2016 Slavery and Human Trafficking Statement

1. About the Statement
Mitsubishi Corporation International (Europe) Plc, ("MCIE") is a wholly owned subsidiary of Mitsubishi Corporation, a global integrated business enterprise which develops and operates businesses across virtually every industry.

As a company doing business in the United Kingdom ("UK"), MCIE has produced this FY2016 Slavery and Human Trafficking Statement (the "Statement") in line with the requirements of Section 54 of the UK Government's Modern Slavery Act 2015 (the "Act"). The Statement is intended to communicate the steps that MCIE has taken during the previous fiscal year of 1 April 2016 to 31 March 2017 ("FY2016") to ensure that slavery and human trafficking are not occurring in any part of its business operations or supply chains.

The definition of “slavery” and “human trafficking” are laid out in Section 1 and 2 of the Act. However, in recognition that these issues can manifest themselves in many ways depending on local circumstances, the Statement covers MCIE’s efforts to prevent any form of worker exploitation through its business, ensuring that workers are safe and that all relevant laws and international standards are being upheld, including freedom of movement and communications.

The Statement has been approved by MCIE’s Board of Directors and has been signed by Haruki Hayashi, Chairman and Managing Director of MCIE.

The Statement is publicly available on MCIE’s website at the following link: http://www.mitsubishicorp.com/gb/en/

2. About MCIE
MCIE is a wholly owned subsidiary of Mitsubishi Corporation, a global integrated business enterprise that develops and operates business across virtually every industry including environmental and infrastructure business, industrial finance, energy, metals, machinery, chemicals, and living-essentials. Mitsubishi Corporation operates in approximately 90 countries and its global network includes over 1,200 group companies, employing a multinational workforce of over 70,000 people.

For more information on MCIE’s history, products and business strategy, please visit the following link: http://www.mitsubishicorp.com/gb/en/about/.

3. MCIE’s Philosophies and Principles
MCIE conducts its business in line with the philosophy and principles of Mitsubishi Corporation.
The Three Corporate Principles – Corporate Responsibility to Society; Integrity and Fairness; Global Understanding through Business – established in the company’s history, serve as Mitsubishi Corporation’s core philosophy. Based upon these Principles, the Corporate Standards of Conduct lay down a set of key, high-level commitments which form the basis of the company’s compliance and risk management systems. Furthermore, the Code of Conduct provides a set of rules based on both national and international standards to ensure that the company’s employees are upholding the highest level of ethical conduct in their day-to-day business.

4. MCIE’s Commitments in Relation to Slavery and Human Trafficking

MCIE is committed to respecting human rights and strives to ensure that its business activities do not cause or contribute to adverse human rights impacts, including slavery and human trafficking. This commitment is expressed through a variety of policies set by Mitsubishi Corporation.

- The Social Charter states that the company “will fully respect human rights” and “will also fully respect fundamental labor rights and endeavor to ensure the provision of safe and healthy working environments.”
- The Basic Stance on Human Rights affirms the company’s commitment to various international standards including the Universal Declaration of Human Rights, the ILO International Labor Standards and the Voluntary Principles on Security and Human Rights.
- Mitsubishi Corporation is also a signatory of the UN Global Compact, declaring the company’s commitment to the 10 universal principles in the fields of human rights, labor, environment and anti-corruption. Principle 4 of the Compact states that the company should strive for “the elimination of all forms of forced and compulsory labor.”
- Mitsubishi Corporation has identified 7 Key Sustainability Issues (Materiality) for the company’s sustainable growth as mileposts to help it realise the simultaneous generation of economic value, societal value and environmental value. Through “Procuring in a Sustainable Manner” as one of the Key Sustainability Issues, Mitsubishi Corporation will continue to implement a sustainable approach to procurement and supply operations while taking into account social and environmental factors not only in the company’s own business but also through the supply chain.
- The Mitsubishi Corporation Policy for Sustainable Supply Chain Management aims to help achieve the above. Article (1) of the Policy states that “suppliers shall employ all employees of their own free will with no employee being subject to forced or bonded labor.” The Policy goes on to address further issues such as child labor, freedom of association and suitable remuneration.
5. **MCIE’s Activities in FY2016 related to Prevention of Slavery and Human Trafficking**

A) **Supply Chain Management**

MCIE strives to ensure that it does not cause or contribute towards adverse human rights impacts through its supply chains. As part of this, during FY2016 MCIE launched a Modern Slavery Impact Assessment with the support of consultancy firm twentyfifty Ltd. The purpose of the Assessment was to determine whether any of MCIE’s value chains are linked to signs of modern slavery and in particular to identify high risk areas. The process involved extensive consultations with business groups and corporate departments as well as management at various levels. Through this process, MCIE identified a number of high risk countries and value chain sectors where it operates. The full results were presented to MCIE’s board members and also shared with Mitsubishi Corporation. Each business group and corporate department also received tailored reports highlighting potential risks specific to each business.

Separately, MCIE also continues to support Mitsubishi Corporation’s global supply chain management process which includes suppliers related to MCIE’s businesses in the European and African regions. The company conducts regular assessments of suppliers in industries where human rights risks including slavery and human trafficking are considered to be particularly salient, such as agricultural produce and apparel. MCIE supports these efforts by helping to identify salient issues and by reviewing the assessment results.


B) **Loan and Investment Proposal Screening**

In order to ensure that the direct business operations and relationships that Mitsubishi Corporation enters into do not cause or contribute to adverse human rights impacts, all loan and investment proposals are vetted through an internal screening process which considers not only financial and legal risks but also environmental, social and governance (ESG) factors including human rights. MC’s ESG screening takes into account various standards which emphasize the importance of human rights such as the International Finance Corporation (IFC) guidelines, Guidelines for Confirmation of Environmental and Social Considerations published by the Japan Bank for International Cooperation (JBIC).

Many of these loans and investments relate to MCIE’s businesses in the European and African regions, and MCIE therefore supports the process by providing local insight and by conducting research to ensure that the proposals do not cause or contribute to adverse human rights impacts.
Further details on the screening process are available at the following link:

C) Training and Awareness Raising
MCIE has been providing human rights training to its employees for several years. During FY2016, MCIE incorporated content specific to modern slavery into its training materials. Training was given at the board level, management level and operational level, and reinforced on various occasions throughout the year.

6. Looking Ahead
MCIE recognises the importance of maintaining constant vigilance to identify, prevent and mitigate adverse impacts associated with human rights, including slavery and human trafficking, throughout its business operations and supply chains. Going forward, MCIE plans to build on the Modern Slavery Impact Assessment launched last year by conducting deep-dive programmes into some of the potential risk areas identified. Progress will be reported on in MCIE’s statement for FY2017. In addition, MCIE will continue to work closely with Mitsubishi Corporation to ensure that their respective commitments and activities remain closely aligned.

7. Approval by MCIE's Board of Directors
I, Haruki Hayashi, hereby certify that the information contained in the above FY2016 Slavery and Human Trafficking Statement is factual and has been approved by the Board of Directors of Mitsubishi Corporation International (Europe) Plc.

Haruki Hayashi
Chairman & Managing Director
Mitsubishi Corporation International (Europe) Plc

15th August 2017  
Date