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1. Message from the Managing Director

[Mitsubishi Corporation International \(Europe\) Plc](#) ('MCIE') is a wholly owned subsidiary of Mitsubishi Corporation ('MC'), a global integrated business enterprise. Our philosophy is underpinned by our Three Corporate Principles which outline our commitment to integrity, fairness and sustainable business. These principles are enshrined in our corporate DNA and help to guide our everyday actions.

As a corporation with a diverse business portfolio our commercial activities span far and wide. From food and energy to metals essential to key industries, we deliver a range of products and services that help support a well-functioning society. But with complex value chains and fragile economies we also recognise the potential for adverse impacts and we take our responsibility to mitigate these seriously. As a company that operates both upstream and downstream I believe we have a unique role to play in engaging actors at both ends of the spectrum to ensure we create a level playing field. In addition to the immediate health crisis, the COVID-19 pandemic has impacted some of the world's most vulnerable communities and the livelihoods that depend on them. Private sector engagement is vital now more than ever to ensure that value is distributed fairly across the system and that a thriving society is created for all.

2. Introduction

This is the sixth Modern Slavery Statement produced by MCIE in accordance with Section 54 of the [UK Modern Slavery Act 2015](#) ('MSA'). The Statement sets out the steps we have taken to address modern slavery in our operations and value chains during FY2020.

3. Company overview

MCIE is a wholly owned subsidiary of MC, a global integrated business enterprise that develops and operates businesses across virtually every industry. Based in London, our four business divisions - Natural Gas and Petroleum, Mineral Resources, Industrial Infrastructure and Food and Consumer Industry - provide a diverse range of products and services. Our business strategy involves leveraging our knowledge of industries and markets around the world to create new, sustainable businesses. We transform opportunities into businesses by providing services to various industries at different stages of the product or project cycle. We add value through our ability to finance and invest in the development of companies and

projects, as well as through our expertise in developing the upstream and downstream activities needed for businesses to succeed.

MCIE currently has a workforce of 126 employees, comprised of 96 locally recruited employees and 30 expatriates from Japan. We work with approximately 250 direct suppliers and have six fully owned subsidiaries in Germany, Italy, France, Spain, Greece and the Netherlands.

4. Relevant policies and commitments

MCIE is committed to respecting human rights and strives to ensure that our business activities do not cause or contribute to adverse human rights impacts, including modern slavery. This commitment is expressed through a variety of policies set by our parent company MC. The following policies are available to all employees through our intranet and are communicated through various training sessions throughout the year.

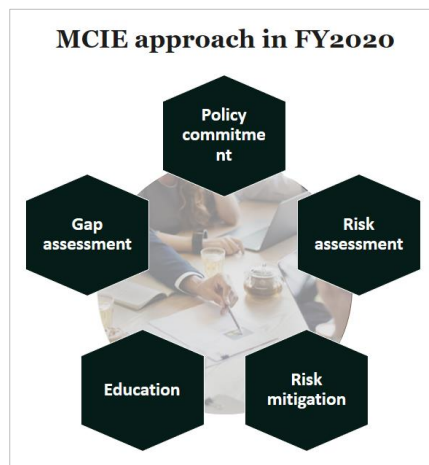
Our '[Three Corporate Principles](#)' – Corporate Responsibility to Society; Integrity and Fairness; Global Understanding through Business – have served as MC's core philosophy since the company's inception. Building on these Principles, the '[Corporate Standards of Conduct](#)' outline a set of high-level commitments which form the basis of our compliance and risk management systems, while our '[Code of Conduct](#)' provides a set of rules based on national and international standards to ensure that our employees uphold the highest level of ethical conduct in their day-to-day business.



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In addition to these overarching principles, our '[Social Charter](#)' states that we will “fully respect human rights” and “fully respect fundamental labour rights and endeavor to ensure the provision of proper working environments with consideration of safety, health and other aspects.” Our '[Basic Stance on Human Rights](#)' elaborates on this further by endorsing various international standards such as the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the core labour standards of the International Labour Organisation, the Voluntary Principles on Security and Human Rights, and the United Nations Global Compact.

Finally, we share our commitments with key third-party partners to ensure that the goods and services we benefit from do not cause or contribute to modern slavery. Our 'Corporate



Business Partner Code of Conduct' requests our key suppliers to "ensure that any form of forced labour is strictly prohibited in accordance with ILO Convention 29 and 105", and outlines a number of prohibitions in relation to bonded labour, restrictions on freedom of movement, retention of personal identification documents and deposits and/or recruitment fee requirements. We also share our commitments with recruitment agencies in the form of a 'Modern Slavery and Human Trafficking Memo'. The Memo details standards which we expect recruitment agencies to uphold in contracting with us and requires review and signature on an annual basis.

5. Risk assessment

MCIE operates across a range of different industries and our risks reflect this diversity. In FY2020 we conducted a refresh of our risk assessment launched initially in FY2016. With support from consultancy firm twentyfifty Ltd, we went through a four month consultation process to map out our value chains across all four business divisions. In doing so we were able to identify a range of potential risk areas which we then prioritised according to their severity, likelihood of occurring and relationship to MCIE. This year's risk assessment has revealed that we have a total of 56 potential risks associated with 20 value chains. The most common risks were found to be associated with activities related to raw material extraction, raw material manufacturing and processing, and transportation of goods. Examples of potentially vulnerable rightsholders include gold miners, mining communities, refinery workers, drivers and shipping crews working in the upstream parts of our value chains. Looking more broadly at human rights in general, future rightsholders were also identified as a vulnerable group vis-à-vis our operations that contribute towards climate change.



6. Risk mitigation

One of MCIE's key roles is to identify new market opportunities and develop business relationships in the region on behalf of MC. As such, the investment proposals which we feed into are screened through MC's due diligence process in Tokyo. To complement this process,

our 'Conducting Human Rights Due Diligence on New Third Parties' guidance and supplementary toolkit are used by our business divisions during tender processes and contract negotiations in order to ensure that partners are assessed prior to MC's decision-making. Since FY2018 we have trained our business divisions on how to use the guidance and toolkit through regular workshops throughout the year.

We also recognise that modern slavery can occur close to home. To mitigate risks within our head office in London, we use our direct leverage to ensure that our recruitment agencies do not charge fees to prospective employees. In FY2020 we received signed declarations from our most frequently used agencies, and subsequently this requirement has become mandatory throughout our recruitment process from start to finish. Furthermore, to avoid fraudulent salary payments we amended our employment terms and conditions to stipulate that an employee's salary must be paid into a UK bank account in their own name. We also contract other third-parties such as cleaning, catering and property maintenance providers. Through annual reviews and regular communication throughout the year we verify that standards are being upheld for support staff who work on our office premises. In FY2020, we re-shared our 'Corporate Business Partner Code of Conduct' with these providers as part of our ongoing efforts to tackle modern slavery. Support staff such as cleaners were identified as being particularly vulnerable due to COVID-19 and various measures were taken to ensure their safety.

7. Capacity-building

We have been providing modern slavery and broader human rights training to our employees for several years. In FY2020 we continued to train various employee groups at the board, management and operational levels to refresh and further refine their knowledge. Training employees working at the operational level is particularly important as they are most directly involved in identifying new business opportunities and managing relationships with third-parties. We use our human rights due diligence guidance and toolkit to help steer these sessions. We also regularly extend our capacity-building to MC's UK based subsidiaries,



although we were unable to do this in FY2020 due to COVID-19 impacts.

Beyond these targeted groups, we also endeavor to raise awareness across the company as a whole. Through lunch and learn sessions and volunteering initiatives we continue to educate employees on the topic. Again, we were unable to prioritise these sessions this year due to COVID-19. However, we continued to share information virtually through our intranet and other online-based platforms.

8. Gap analysis


Finally, during the reporting year we hired twentyfifty to conduct a gap analysis of our activities against the UN Guiding Principles on Business and Human Rights. Through a combination of internal consultations and desk-based reviews we identified a number of gaps and areas for improvement. Some of these are reflected in the 'Looking ahead' section below and have been reported to management at both MCIE and MC.

9. Looking ahead

MCIE's goal is to prevent incidents of modern slavery from occurring in our operations and value chains and cultivate a healthy working environment where people can thrive. Over the coming year, our priority will be to start implementing the remaining steps of the human rights due diligence (HRDD) cycle including tracking, communication and remediation. We will continue to place emphasis on capacity-building, and will shortly be launching a virtual HRDD training programme for our own employees as well as subsidiaries in the region. Throughout the year we will continue to work closely with MC to ensure that our commitments and activities remain closely aligned. We will report on progress in our FY2021 Modern Slavery Statement.

10. Approval by MCIE's Board of Directors

I, Yoshinori.Katayama, hereby certify that the information contained in the above FY2020 Modern Slavery Statement is correct, and that it was approved by MCIE's Board of Directors at a board meeting on 31st August 2021.



Yoshinori.Katayama
Managing Director

Mitsubishi Corporation International (Europe) Plc

31st August 2021

Date