

Slavery and Human Trafficking Statement (FYE 3/2022)

1. Foreword

In accordance with section 54 of the Modern Slavery Act 2015 (the United Kingdom), Marubeni Corporation (hereinafter called the “Company”, “We”, “Our” or “Us”) publish the slavery and human trafficking statement for the financial year ended 31 March 2022 (hereinafter called this “Statement”). This Statement has been approved by the board of directors at its meeting on 24 August 2022.

2. About our business and supply chains and others

The Marubeni Group conducts business from 132 locations*¹ domestically and internationally, employing over 40,000 people*² from a diverse range of nationalities and ethnicities. Moreover, our multi-faceted and global business activities span a wide range of sectors. (*¹As of 1 April 2022 *²As of 31 March 2022).

In the financial year ended 31 March 2022 (hereinafter called “FYE 3/2022”), we were involved in the business and supply chains related to 15 business divisions comprising Lifestyle, ICT & Real Estate Business, Forest Products, Food (I and II), Agri Business, Chemicals, Energy, Metals & Mineral Resources, Power Business, Infrastructure Project, Aerospace & Ship, Finance & Leasing Business, Construction, Industrial Machinery & Mobility, and Next Generation Business Development (details can be found in our “[Integrated Report 2021](#)”).

3. Policies in relation to respect for human rights

We have declared respect for the human rights of all stakeholders who may be affected by our business activities and have established the “[Marubeni Group Basic Policy on Human Rights](#)”. In addition, in our “[Compliance Manual](#)”, which prescribes the code of conduct that officers and employees of our group must abide by, we set forth the respect for the human rights. Furthermore, we recognize that the scope of our responsibilities covers not only our own company but also our supply chains, including our business partners. We have established the “[Basic Supply Chain Sustainability Policy](#)” that includes a code of conduct that we expect our suppliers to comply with. We have also declared our support for the UN Global Compact (UNGC), an international initiative advocated by the United Nations which specifies ten principles to be observed by companies in four fields, namely, human rights, labour, environment and anti-corruption. We are working to realize the ideals of the [UNGC by supporting the ten principles](#).

4. Initiatives to prevent slavery and human trafficking from arising

The initiatives we have made in FYE 3/2022 are described below (details can also be found in the “[Sustainable Development Report 2022](#)”).

a. Supply Chains

Before FYE 3/2022, we conducted research and analysis of all products and projects handled by the Company for potential ESG risks, through collaboration with an external consultant.

In FYE 3/2022, we conducted a more accurate risk mapping and narrowed down the list of higher-priority products by referring to various indexes and considering the geographical conditions of the countries of procurement and business. As a result, we have selected several products related to food, apparel, metals, conflict minerals, and forest products, identified as “Critical Commodities in Supply Chain”. We plan to conduct further actions with our suppliers in these product areas in the future, including detailed investigations.

In addition, we communicate the “Marubeni Group Basic Policy on Human Rights” and “Basic Supply Chain Sustainability Policy” mentioned above (together, hereinafter called our “Basic Policies”) to our suppliers, and request their understanding, as well as cooperation and compliance with our Basic Policies. Through FYE 3/2022 and to date, as a group, we have shared the Basic Policies and requested cooperation from approximately 23,000 suppliers.

b. Business Projects

In the financial year ended 31 March 2021, we adopted a “Sustainability Assessment Tool” based on international risk management standards such as the “Global Slavery Index” and “Corruption Perception Index”, in order to conduct assessments of sustainability risks involved in new investments and development projects – environmental and social, particularly occupational health and safety, and human rights – to inform the decision-making procedures. In FYE 3/2022 we continue to operate this method of assessment. More detailed checks were carried out on the business projects with features requiring careful assessment of the risk categories relevant to modern slavery and human trafficking, and no problems were found.

c. About our group companies (consolidated subsidiaries) - continuous monitoring

We conducted a sustainability survey on our consolidated subsidiaries from the fiscal year ended 31 March 2020 to the fiscal year ended 31 March 2021. No problems requiring immediate action were identified as a result of the survey. Based on this, since FYE 3/2022, we have been continuously monitoring whether there are any changes in risk factors, such as changes in the business conditions of each consolidated subsidiary.

d. Remedy (grievance mechanism)

In order to be able to take remedial actions, even for hidden human rights violations that might go undetected by our research, we have formulated internal rules through documentation of the grievance procedure. This procedure has been in operation since FYE 3/2022 (we have also established a dedicated contact point for human rights issues to better facilitate external access).

e. Training

We have conducted internal [training on human rights](#), including the topic of preventing slavery and human trafficking, in various formats and occasions. In FYE 3/2022 we also conducted such training as part of the following programs: General Training / Onboarding for New Employees, Basic Practical Training, Training for New Department General Managers, Training for New Section General Managers, Administrative Track (upper level) Promotion Training, 4th year Training and Training for Recruiting Interviewers. In addition, we continue to distribute our aforementioned Compliance

Manual annually to group officers and employees around the world, and work to develop capabilities and raise awareness regarding the prevention of slavery and human trafficking.

5. Looking ahead

We evaluate the status of implementation and effectiveness of the above efforts, and we are continuously trying to improve and strengthen them.

In the future, we will increase our efforts to ascertain whether any negative human rights impacts are occurring in relation to our business, for instance by expanding our investigations to the suppliers, in high-priority product areas. Should any problems be found, where necessary we will respond with remedial or other appropriate actions.

25 August 2022



Takayuki Furuya
Managing Executive Officer
Member of the Board