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Marubeni-Itochu Tubulars Europe Plc
Slavery and Human Trafficking Statement for Fiscal Year 2022

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and constitutes Marubeni-Itochu Tubulars Europe PLC's slavery and human trafficking statement for the financial year ending on 31st March 2023 (the "Fiscal Year 2022").

1. The Company's Structure and Our Supply Chain Complexity

   Marubeni-Itochu Tubulars Europe Plc ("MITE") is a wholly owned subsidiary of Marubeni-Itochu Steel Inc ("MISI"), a Japanese trading house which is engaged in trading of steel products such as Slab, Billet, Bloom, Bar, Shapes, Rail, Plate, Coil and Pipe, as well as business investment in Japan and overseas. MITE is particularly engaging in trading of Pipe, Plate and Coil to the Oil, Gas & Renewable Energy industries and sources such products from suppliers who have been audited and qualified by the customers in these industries.

2. Our Policy on Modern Slavery and Human Trafficking

   MISI is committed to ensuring that no modern slavery or human trafficking exists in its supply chains or in any part of its business. MISI establishes a Compliance Programme for the matters that must be observed by each company of the MISI group, including respect for human rights.

   MITE, as a member of MISI group, recognises MISI's Programme and establishes its own Compliance Programme which includes respect for human rights and the elimination of modern slavery in our supply chain.

3. Due diligence processes

   In Fiscal Year 2022, MITE maintained a list of approved vendors and used a supplier evaluation questionnaire for new vendors.

   Were we ever to discover a case of a supplier not complying with anti-slavery guidelines, we would request the relevant supplier to take remedial action immediately. If the supplier fails to comply with this request, we would remove them from our approved vendor list.

4. Risk assessment

   While MITE has not discovered cases of slavery or human trafficking in its supply chain, we recognise that our supply chains extend into a number of countries and that we must remain alert to the risk that modern slavery may exist in our supply chain and continue to take steps to reduce this risk.

5. Measuring effectiveness

   MITE has established a Compliance Committee which meets at least twice a year to monitor the company's compliance with both internal and external regulations including the Modern Slavery Act.

6. Training for staff

   MITE held in-house training for all employees during Fiscal Year 2021 to promote their understanding of the relationship between business activities and human rights, including the prohibition of slavery and human trafficking from our supply chain. During Fiscal Year 2022 MITE held induction training for new employees to ensure that they are also aware of the company's obligations in this regard.

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This statement was approved by the board of directors of MITE.

Nobuyoshi Ohata
Managing Director
29 September 2023