



ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT

1. Introduction

This statement sets out the measures Mitsui & Co. Europe Ltd (“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, UK. (The registered office address will change to 8th & 9th Floors, 45 Gresham Street, London EC2V 7EH, UK in early October 2026.) Mitsui Europe operates and has offices and subsidiaries in the UK and across Europe.

For more information on our organisation, please visit the following link:

<https://www.mitsui.com/jp/en/company/outline/worldwide/europe/index.html>.

Mitsui Europe is a wholly owned subsidiary of Mitsui & Co., Ltd (“Mitsui”), headquartered in Japan. Mitsui is a publicly listed company and endorses the United Nations Guiding Principles on Business and Human Rights and the Ten Principles of the United Nations Global Compact (the “Global Compact”). Mitsui conducts its business activities in line with these principles. (<https://www.mitsui.com/jp/en/sustainability/philosophy/initiative/>)

3. Our Business

Our business is wide ranging and includes activities from product sales, worldwide logistics and financing through to the development of major international infrastructure and other projects in the following business areas: Mineral & Metal Resources, Iron & Steel Products, Energy, Mobility, Digital & Infrastructure, Chemicals, Wellness Ecosystem, and Innovation & Corporate Development.

Our annual turnover for the financial year ended 31 March 2026 (“FYE March 2026”) was above the £ 36 million 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 products including 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.

Since the fiscal year ended March 2020, Mitsui has identified sectors within its supply chains where human rights risks, including forced labour and human trafficking, are considered more likely to arise, and has focused its human rights due diligence on those high-risk sectors.

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, comprehensively considering the 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 2025](#)", "[Materiality](#)" on [Mitsui Website](#).

5. Our Policies and Guidelines

Mitsui Europe 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 structures. They also refer to the Global Compact to remind all our employees of the importance of understanding and complying with its 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.

Materiality

Mitsui originally defined its materiality in 2015, then re-identified five new material issues in 2019. In May 2025, Mitsui's materiality was further reviewed from the perspective of double materiality to ensure that our recognition of social issues is in line with the ever-changing operating environment. As a result of this review, a new material issue, "Cultivating societies that respect human rights", was added to Mitsui's materiality.

Sustainability Policy

Formulated in November 2021, 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 through our business activities to both the realisation of a sustainable society and economic growth.

Human Rights Policy

Formulated in August 2020 and revised in February 2022, 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 to understand and respect human rights in the manner specified therein.

“With Integrity” – Mitsui & Co. Group Conduct Guidelines

Mitsui's “With Integrity” Guidelines require respect for human rights and prohibit discrimination of any kind. The Guidelines were updated in 2024 to enhance commitments relating to respect for human rights, diversity, health and safety, and responsible business conduct.

Sustainable Supply Chain Policy

Mitsui's former “Supply Chain Corporate Social Responsibility Policy” was updated and renamed as the “Sustainable Supply Chain Policy” in 2020 to align with Mitsui's Human Rights Policy and revised in August 2023. 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, paper products, marine products, green coffee and cocoa beans)

Formulated in July 2021 and revised in 2022, 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. In addition, Mitsui's consolidated subsidiary, Mitsui & Co. Seafoods Ltd., which handles marine products, formulated the procurement policy for marine products with the goals of eliminating IUU (illegal, unreported, and unregulated) fishing and overfishing in November 2023. In February 2026, Mitsui established separate procurement policies for green coffee and cocoa beans with the aim of ensuring that their procurement does not contribute to deforestation or land-use conversion and that workers, indigenous peoples, and local communities are treated with due consideration. In accordance with these policies for specific commodities, 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 \(FPIC\) of Indigenous Peoples”](#).

Respecting Internationally Recognised Human Rights Standards

We are committed to respecting human rights, which we understand as, at a minimum, those set out in the International Bill of Human Rights, including the UN Declaration of Human Rights, and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work. We also support the United Nations Guiding Principles on Business and Human Rights and the Ten Principles of the United Nations Global Compact, and conduct our business activities in line with these Principles.

6. Our Approach

To address the risks identified, Mitsui Europe conducts and/or supports the following measures and initiatives.

- **Management Framework** – Mitsui has established internal rules governing its human rights management framework, including the group-wide management structure, roles and responsibilities, and implementation processes. The framework is intended to help prevent human rights infringements in Mitsui's activities and to address risks involving business partners. Mitsui Europe supports the implementation of this framework from a regional perspective.
- **Supplier Communication** – When commencing business with a new supplier, Mitsui and its group companies send formal written communication requesting the suppliers to understand and cooperate with the implementation of Mitsui's [Sustainable Supply Chain Policy](#). In addition, in May 2022, Mitsui developed the Sustainable Supply Chain Management Handbook, for its suppliers and other business partners. Mitsui utilises this handbook to promote understanding and seek cooperation with its policies and initiatives related to sustainable supply chain management.
- **Supplier Questionnaire Surveys** – Mitsui conducts regular questionnaire surveys on selected major suppliers, handling products in high-risk sectors. These surveys are used to assess suppliers' practices against the expectations set out in Mitsui's [Sustainable Supply Chain Policy](#). Mitsui also assesses whether those suppliers have their own policies and measures addressing human rights and environmental matters.
- **Supplier On-Site Inspections** – Mitsui conducts in-person interviews with management and employees of suppliers operating in high-risk sectors, including personnel responsible for health, safety and environment (HSE), and on-site inspections of their facilities with an external expert in high-risk sectors.
- **ESG impact assessments** – New business investment is subject to ESG impact assessments which cover human rights risks, including forced labour and other forms of modern slavery, as well as pollution prevention, climate change, ecosystems, and

water stress.

- Where appropriate, Mitsui Europe may include Mitsui's human rights-related provisions in purchase contracts, requiring sellers to comply with applicable human rights requirements and Mitsui's [Sustainable Supply Chain Policy](#), and respect internationally recognised human rights, including those represented in the International Bill of Human Rights and principles described in the ILO Declaration on Fundamental Principles and Rights at Work.
- Internal Audits – Internal audits of relevant business units, corporate staff divisions, and Mitsui's group companies include assessments of ESG matters, including respect for human rights.
- Workforce – Mitsui Europe designs its employment, recruitment, and remuneration practices to comply with applicable laws and regulations in the jurisdictions in which it operates.

- Training – Staff awareness is an important element of our efforts to address modern slavery and human trafficking risks, and Mitsui conducts ongoing training and awareness-raising initiatives for all employees.

In November 2025, Mitsui Europe required employees to (i) reconfirm their understanding of, and compliance with its Business Conduct Guidelines (BCG), which emphasise compliance with applicable laws and respect for human rights and (ii) to complete Mitsui's group-wide sustainability management e-learning programme. The available courses included modules on Mitsui's Human Rights Policy and its procurement policies for specific commodities.

In December 2025, Mitsui held a human rights seminar for business partners and employees of Mitsui group companies, which was open to Mitsui Europe employees.

- Whistleblowing – Mitsui Europe maintains a whistleblowing framework through which employees may report, raise concerns or seek advice on suspected compliance issues, including potential human rights violations, anonymously where appropriate. Measures are in place to protect whistleblowers from retaliation or detrimental treatment.

We will continue to review our approach and training programmes to support ongoing 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 2026. This statement will be reviewed and updated annually.

The Board of Mitsui Europe approved this statement on 18 September 2026, and it is signed by our Managing Director, Maroshi Tokoyoda.



Maroshi Tokoyoda
Managing Director
Mitsui & Co. Europe Ltd