

ITOCHU Europe PLC
Slavery and Human Trafficking Statement for Fiscal Year 2018

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and constitutes ITCE's slavery and human trafficking statement for the financial year ending on 31 March 2019 (the "Financial Year 2018").

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

ITOCHU Europe PLC ("ITCE") is a wholly owned subsidiary of ITOCHU Corporation ("ITC"), a Japanese *sogo shosha* which is engaging in trading of products such as textiles, machinery, metals, minerals, energy, chemicals, food, general products, realty, information and communications technology, and finance, as well as business investment in Japan and overseas. ITCE is engaging in the trading of textiles, chemicals and food products such as sugar, cocoa and pork, as well as business investment in the UK and other European countries.

2. Our Policy on Modern Slavery and Human Trafficking

ITC is committed to ensuring that no modern slavery or human trafficking exists in its supply chains or in any part of its business. ITC is participating in the United Nations Global Compact and applies the concepts of the United Nations Guiding Principles on business and human rights. ITC's existing policies contain provisions aimed at ensuring that there is no slavery or human trafficking in any part of its global business or supply chain.

Such policies include:

- ITOCHU group's Corporate Philosophy and Code of Conduct
(<https://www.itochu.co.jp/en/about/mission/>)
- Policies Related to Human Rights
(https://www.itochu.co.jp/en/csr/itochu/human_rights/)
- Respect for Human Rights in Business Activities
(https://www.itochu.co.jp/en/csr/itochu/human_rights/)
- Human Rights in Our Supply Chain and Business Investment
(https://www.itochu.co.jp/en/csr/itochu/human_rights/)
- The United Nations Global Compact
(https://www.itochu.co.jp/en/csr/itochu/global_compact/)
- ITOCHU's CSR Action Guidelines for Supply Chains
(https://www.itochu.co.jp/en/csr/supply_chain/management/)
- Internal Information Reporting System(Hotlines)
(https://www.itochu.co.jp/en/about/governance_compliance/compliance/)

ITCE, as a member of ITC group company, recognizes these policies and engages in business in accordance with the principles under these policies.

3. Development of the Policy and Guideline

In Financial Year 2018, ITCE promoted i) its own written policy (the “Policy”) to ensure that there is no slavery or human trafficking in its supply chains (rather than referring to ITC’s policy) and ii) its own written guideline (the “Guideline”) to explain ITCE’s position aimed at slavery and human trafficking issues in its supply chains.

In accordance with the Policy, ITCE has sent out or handed out the Guideline to all major relevant food and textile suppliers to ensure their recognition of its position that there is no slavery or human trafficking in its supply chain policy.

4. Training

Further to the in-house training sessions held in the previous financial years, ITCE conducted similar sessions again in Financial Year 2018 to the relevant employees, especially the food and textile sectors. Such sessions were carried out to broaden their understanding of the relationship between business activities and human rights. Also, through such sessions, our colleagues discussed their business from the perspectives of the modern slavery act. It was noted in this training session that slavery and human trafficking should be banned from our supply chains.

5. Further Steps

Following the review of Financial Year 2018 and in accordance with the Policy, ITCE intends to take the following steps:

- 1) to continue to regularly educate our employees and promote their awareness of ITC’s policy;
- 2) to continue providing the Guideline to all relevant suppliers, especially in the food and textiles industry;
- 3) to request the relevant supplier to take remedial action when discovering a case that does not comply with the Guideline; and
- 4) to re-examine its business dealings with such suppliers if progress has not been achieved after such request.

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

30 September, 2019



Hiroshi Sato
Chief Executive Officer
ITOCHU Europe PLC