ITOCHU Europe PLC <u>Slavery and Human Trafficking Statement for Fiscal Year 2016</u>

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 2017 (the "Financial Year 2016").

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 trading of textile, chemicals and food products 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. ITCE has been doing business in accordance with the principles under these policies.

3. Training

Further to the in-house training session held in the previous financial year, ITCE conducted similar session again in Financial Year 2016. Such session was made for ITCE's employees to spread their understanding toward the relationship between business activities and human rights. It was referred in this training session that slavery and human trafficking should be banned from our supply chains.

4. Development of the Policy and Guideline

In Financial Year 2016, ITCE developed 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 established 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 started the process for sending the Guideline to all relevant suppliers to secure their recognition of its position that there is no slavery or human trafficking in its supply chain policy.

5. Further Steps

Following the review of Financial Year 2016 and in accordance with the Policy, ITCE intends to take the following steps:

- 1) to proceed with the process for sending the Guideline to all relevant suppliers;
- 2) to request the relevant supplier to take remedial action when discovering a case that does not comply with the Guideline;
- 3) to reexamine its business dealing with such suppliers if progress has not been achieved after such request; and
- 4) to regularly educate our employees and promote their awareness of ITC's policy.

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

15 September, 2017

Hiroyuki Tsubai Chief Executive Officer

ITOCHU Europe PLC