

## Modern slavery statement for financial year 2019/20

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Mitsubishi Pencil Co UK Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Mitsubishi Pencil Co UK Ltd has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### Our business

MPCUK is a subsidiary of Mitsubishi Pencil in Japan and is an importer and distributor of Uniball and Posca pens, supplying retail, B2B and online customers. We operate in the UK, Ireland and Scandinavia and work with three manufacturing sub-contractors and several packaging suppliers. In the UK we currently have under 30 employees.

### Our high-risk areas

We recognise that some of our suppliers will be at greater risk of slavery and human trafficking. To alleviate this, we have amended our terms and conditions to mandate compliance to the Modern Slavery Act 2015.

### Systems

We have in place systems to:

- Identify and assess potential risk areas in our supply chain;
- Mitigate the risk of slavery and human trafficking occurring in our supply chain;
- Monitor potential risk areas in the supply chain; and
- Protect Whistle-blowers.

### Our policies (available on request)

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or any part of our business. We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy reflects our commitment to acting ethically and with integrity in all our business relationships. It sets out our stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

### Our suppliers

Mitsubishi Pencil Co UK Ltd operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that a particular organisation has never been convicted of offenses relating to modern slavery and potential on site audits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light]

### Training

We conduct training for our procurement team so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

### Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

### Approval for this statement

This statement was made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the remaining of the financial year ended 31<sup>st</sup> December 2019 and for the financial year ended 31<sup>st</sup> December 2020. This was approved by the Board of Directors on 3<sup>rd</sup> July 2019

Name : Hiroshi Yokoiishi  
Signature

S.1/03/07/2019

Registered in England no. 1853477

Date 3rd July 2019  
Approved by: TP