2024 Modern Slavery and Human Trafficking Statement of Mizkan Euro

1. Introduction

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 (the "Act"). It covers all Mizkan Group companies that have a demonstrable presence in the UK including but not limited to Mizkan Euro Ltd., Mizkan Euro Partners Limited. and Mizkan Euro Holdings Limited (collectively, "Mizkan Euro"). It outlines the measures that Mizkan Euro has taken to reduce the risk of modern slavery or human trafficking within its organisation as well as in its supply chain, during the financial year from 1 March 2023 to 29 February 2024.

2. The organisation structure, business, and supply chain of Mizkan Euro

Mizkan Euro are the European subsidiaries of the Mizkan Group, a family-owned, Japanese business which started in 1804. Mizkan Group is the number one sushiseasoning supplier in the world. Headed by Miwa Nakano, Mizkan Group is a global business with over 220 years of experience in producing high quality food products. Mizkan Euro has grown into a global organisation, having acquired iconic UK brands, including Branston, Sarson's and Haywards. This has advanced its portfolio as part of its growth plan in the UK and Europe, cementing its position as pickled vegetables and vinegar category experts.

Mizkan Euro currently has 2 production sites in the UK, where many of its finished products are produced. A minority of its products are manufactured by third party suppliers. These third-party suppliers are taken on board only after Mizkan Euro is satisfied through its audit(s) of the facilities and manufacturing processes. Mizkan Euro sources its raw ingredients and packaging materials from around the world. Mizkan Euro maintains a comprehensive list of all of its suppliers, its location (including manufacturing sites), and conducts supplier audits based on a risk-based approach. During the last fiscal year, Mizkan Euro has conducted audits on 35 suppliers.

3. Mizkan Euro's Rule on slavery and human trafficking

Mizkan Euro is committed to ensuring that there is transparency in its operations, in its approach to modern slavery throughout its business and to ensuring that there is no modern slavery or human trafficking in its business or its supply chain.

Mizkan Euro abides by its Anti-Modern Slavery and Human Trafficking Rule which is an internal corporate policy, aligned with the Act and reflects its commitment to acting ethically and with integrity in all its business relationships. Mizkan Euro is continuously developing, implementing, and enforcing effective systems and controls to ensure that modern slavery and human trafficking do not take place anywhere in its business and within its supply chain.

The Mizkan Group Human Rights Policy upholds our respect for the human rights of all Mizkan Group employees, in line with international standards of conduct such as the United Nations Guiding Principles on Business and Human Rights and the International Bill of Human Rights and the International Labour Organization (ILO) Declaration. These policies and procedures apply to all staff working within the Mizkan Group regardless of their role or seniority.

The Mizkan Group also sets out in the Procurement section of the "Mizkan Group Procedure", that compliance with anti-modern slavery and human trafficking laws and regulations is vital. The policies and procedures are monitored and updated from time to time, to ensure that they are aligned with the current Mizkan Group business and environment.

4. Mizkan Euro's due diligence processes for modern slavery and human trafficking

Mizkan Euro expects the same high standards as it applies to its own operations, from all of its contractors, suppliers and other business partners and expects that they hold their own supply chain to the same high standards. Mizkan Euro has been operating with its standard terms and conditions that specifically includes the obligation to comply with the Act as an essential term of the contract. Mizkan Euro communicates to its suppliers that risks of modern slavery such as forced labour cannot be tolerated and from time to time, ensures by way of obtaining confirmation from its business partners that effective compliance programmes are in place to eradicate any such risks.

Mizkan Euro's food supply chain is moderately complex with, in some cases, a varying number of suppliers between Mizkan Euro and its sources of raw materials. Mizkan Euro therefore applies a supplier due diligence approach which takes into account the breadth, depth and interconnectedness of the food supply chain whilst maintaining its focus on transparency and assurance.

The application of Mizkan Euro's supplier due diligence requirements and the extent of the due diligence is driven by a risk-based process focused on the location of the manufacturing site of a supplier and the sector in which the supplier operates. Supplier due diligence follows a tiered approach for both new and existing suppliers. Depending on its risk assessment of the manufacturer's operations, Mizkan Euro may evaluate compliance based on MSA statements, SEDEX self-assessment ethical questionnaires,

SEDEX registrations, SMETA (Sedex Members Ethical Trade Audit) and/or audits (either by a third party or by a Mizkan Euro controlled audit team, which may include visits to suppliers and their manufacturing sites). Concerns about slavery and/or human trafficking are identified through the due diligence or questionnaires.

5. Training and next steps

To ensure the necessary understanding of the risks of modern slavery and human trafficking in Mizkan Euro's business and supply chain, the HR Department runs training programmes including at its two sites, to enhance awareness and understanding amongst staff.

As a next step, Mizkan Euro is currently working on a Code of Conduct to share with all direct suppliers and make available on its website, to clarify Mizkan Euro's core ethical principles as well as to increase the awareness amongst the public of Mizkan Euro's ethical policies and its seriousness towards preventing modern slavery.

Furthermore, all Mizkan Euro employees, contractors and partners are encouraged to raise, at the earliest possible stage, concerns about any issue or suspicion of modern slavery in any parts of the organisation or its supply chains. Mizkan Euro operates a Whistleblowing policy to encourage employees to come forward with any concerns.



Ichiro Nishikura, Director and CEO of Mizkan Euro Ltd. (14 August 2024)

l. Jishih

Ichiro Nishikura, Director and CEO of Mizkan Euro Partners Limited (14 August 2024)

Jose Mouster

Takahiro Masaki Secretary of Mizkan Euro Holdings Limited (02 August 2024)