ITOCHU CORPORATION (TYO: 8001)

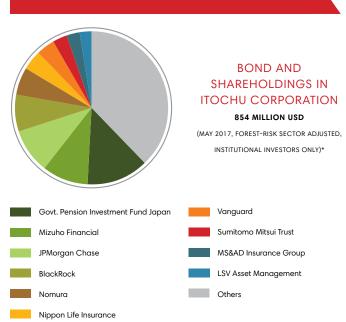


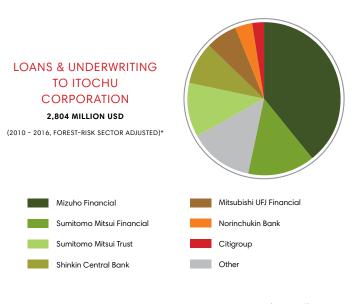
One of the largest trading houses in Japan, Itochu is exposed to widespread social conflict and deforestation risks through its investments in rubber processing as well as trade with companies involved in illegal and unsustainable pulp & paper, timber, palm oil, and natural rubber productions. Itochu makes no commitment to no deforestation for its procurement of pulp & paper, timber, or rubber, and it lacks transparency on supply chain ESG risks and due diligence measures.

COMPANY PROFILE & SUSTAINABILITY COMMITMENTS

CEO	Masahiro Okafuji	FOREST RISK COMMODITIES	Palm oil, pulp & paper, timber, rubber
PARENT COMPANY	-	SUPPLY CHAIN EXPOSURE	Processing, trading, manufacturing, wholesale, retail
MARKET CAP (USD)	23.55 billion USD (FT.com)	AFFECTED TROPICAL FOREST AREAS	Indonesia, Malaysia, Thailand, Myanmar & Brazil
Annual Revenue (USD)	FY2016 4.59 billion USD (FT.com)	RELEVANT GROUP COMPANIES	P.T. Aneka Bumi Pratama (rubber processing & sales), RubberNet (rubber
HEADQUARTERS	Japan		sales), Itochu Kenzai (wood products), Daiken (building materials), Fuji Oil (TYO: 5017) (palm oil), Itochu Pulp & Paper
LANDBANK (HA)	N/A		
NDPE POLICY	Partial (Fuji Oil (<u>2016</u>) palm oil policy only).	KNOWN BUSINESS RELATIONSHIPS	Joint Venture Partners: APP (APP Japan), Sri Trang (Thai Tech Rubber)
			APP SRI TRANG
THIRD PARTY VERIFICATION	Partial - prioritizes procurement of certified wood products (<u>Itochu</u> , <u>2017</u>). Itochu and Fuji Oil are RSPO members, but supply chains are not 100% RSPO certified (<u>RSPO</u> , <u>2015</u> & <u>RSPO</u> , <u>2015a</u>). Lack of adequate information on verification of NDPE compliance.		High risk suppliers: APP and APRIL (paper), Wilmar, Golden Agri Resources and Musim Mas (palm oil), Shin Yang (timber) (Jakarta Post, 2016; Sri
TRACEABILITY	Weak - some traceability achieved for timber (Global Witness, 2016) and palm oil (Fuji Oil, 2016).		Trang, Global Witness, 2016; personal communications with Itochu)
TRANSPARENCY	Partial - inadequate disclosure of supply chain information or ESG risks.		

INVESTORS AND FINANCIERS





ESG PERFORMANCE

HUMAN RIGHTS

- » Pulp & paper suppliers Asia Pulp & Paper (APP) and Asia Pacific Resources International (APRIL) are embroiled in numerous land conflicts with local communities (see <u>APP profile</u>). As of June 2016, APRIL had 42 land conflicts outstanding, and 84,699 ha of APRIL and supplier concessions were inactive due to unresolved conflicts (KPMG, 2016).
- » Timber supplier Shin Yang has been in a 30-year conflict with the Penan communities of Sarawak, Malaysia and is currently in the midst of a lawsuit for violating the community's native customary rights to their land (Global Witness, 2015).
- » Palm Oil suppliers Wilmar and Golden Agri Resources (GAR) have a significant number of unresolved social and land conflicts. Wilmar was recently documented to be engaged in child labor and forced labor practices (see <u>Wilmar profile</u>).
- » Rubber business partner Sri Trang was implicated in labor abuses, including child labor, at its Thai-based factory Siam Sempermed (FinnWatch, 2015). Through its joint venture with Ayeyar Hinthar Holdings, Sri Trang is rapidly expanding its rubber operations in Myanmar, where commercial rubber production is closely linked with widespread land grabbing (Global Witness, 2015a & Oxfam, 2017).

CLIMATE AND BIODIVERSITY

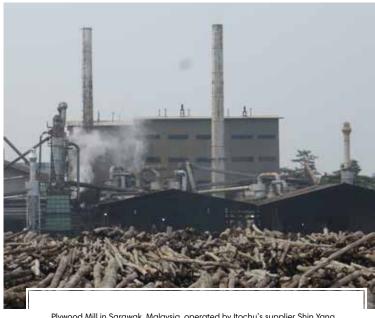
- » Pulp & paper suppliers APP and APRIL are responsible for large-scale conversion of Sumatra's endangered forests (see APP profile). Between 2008 and 2011 alone, APRIL cleared over 140,000 hectares of tropical forest, most of which would likely be considered High Conservation Value Forest (Eyes on the Forest, 2012).
- » Timber supplier Shin Yang has been carrying out highly destructive logging of intact rainforest in Sarawak, Malaysia, in a transboundary conservation area known as the Heart of Borneo (Global Witness, 2015). Shin Yang supplies tropical plywood to Itochu and exposes Itochu to a very high risk of sourcing from this highly sensitive area (Global Witness, 2016).
- » Palm Oil suppliers Wilmar, GAR and Musim Mas are at risk of sourcing palm oil linked to the destruction of the Leuser Ecosystem (RAN, 2016) (see <u>Wilmar profile</u>).
- » Itochu's sourcing of rubber through its JV Thai Tech exposes it to risks of deforestation, especially in Myanmar (Woods, 2015 & The Straits Times, 2016). Commercial rubber is a major driver of deforestation in Southeast Asia, leading to significant biodiversity loss and ecosystem degradation (Mongabay, 2016).

GOVERNANCE

- » Itochu's sourcing of timber from Sarawak, Malaysia, exposes it to a high risk of purchasing illegal timber. Evidence of illegal logging in Sarawak, including by supplier Shin Yang, has been verified by several independent sources (Global Witness, 2016).
- » Pulp & paper suppliers APP and APRIL are at risk of violating

- Indonesia's recent regulations prohibiting new land clearing and canal development in peatlands. In October 2016, the Indonesian Government cancelled the 10-year workplan of an APRIL subsidiary due to plans to expand on peat. Government field investigations in November found APRIL engaged in illegal land clearance and canal development on peat (EcoDaily, 2016; see also APP profile).
- » Palm Oil supplier Wilmar may have violated numerous Indonesian labor laws, including child labor, and relies extensively on third party suppliers without sufficient oversight of compliance with social and environmental standards (see <u>Wilmar profile</u>).
- » Sri Trang's rubber sourcing from Myanmar exposes Itochu to significant corruption risks. Myanmar ranks 136 out of 176 countries in the Corruption Perception Index (Transparency International, 2016), and investigations have revealed how the Myanmar army collaborated with the district government and private companies to confiscate large swathes of land for commercial rubber production (Global Witness, 2015). Sri Trang's joint venture partner in Myanmar, Ayeyar Hinthar Holdings, has been evaluated poorly by the Myanmar Center for Responsible Business (Pwint Thit Sa Project: Transparency in Myanmar Enterprises, 2016, p. 22).
- » Itochu's Procurement Policy on Wood and Paper Products fails to commit to no deforestation or protection of peatlands, and it has no policy on the procurement of rubber. Itochu's sourcing from Shin Yang, APP and APRIL are in clear violation of its policy to not "procure[] from any suppliers who contribute to serious environmental or social problems."
- » Itochu lacks transparency on its supply chain risks and risk mitigation measures. It makes limited disclosure of its supply chain, and provides inadequate information on its due diligence including third party verification. Its 2016 survey of suppliers found "no serious problems requiring immediate response" despite the high ESG risks highlighted above (Itochu, 2016).

Note: for the full reference list, see the original report 'Every Investor Has A Responsibility'



Plywood Mill in Sarawak, Malaysia, operated by Itochu's supplier Shin Yang. **PHOTO:** GLOBAL WITNESS