

FY2017 Slavery and Human Trafficking Statement

1. About the Statement

As a company which carries out a portion of its business in the United Kingdom (UK), Mitsubishi Corporation (MC) has produced this FY2017 Slavery and Human Trafficking Statement (hereinafter "the Statement") in line with the requirements of Section 54 of the UK Government's Modern Slavery Act 2015 (hereinafter "the Act").

The Statement is intended to communicate the steps that MC has taken during the previous fiscal year (FY2017) to ensure that slavery and human trafficking is not occurring in any part of its business or supply chains.

The definitions of "slavery" and "human trafficking" are laid out in Section 1 and 2 of the Act. However, in recognition that these issues can manifest themselves in many ways depending on local circumstances, the Statement covers MC's efforts to prevent any form of worker exploitation through its business, ensuring that workers are safe and that all relevant laws and international standards are being upheld, including freedom of movement and communications.

The Statement has been approved by MC's Board of Directors and has been signed by Mr. Iwao Toide, Member of the Board and Executive Vice President for MC.

The Statement is publicly available on MC's website.

2. About Mitsubishi Corporation (MC)

MC is a global integrated business enterprise that develops and operates businesses across virtually every industry including industrial finance, energy, metals, machinery, chemicals, living essentials and environmental business. MC's current activities expand far beyond its traditional trading operations as its diverse businesses range from natural resource development to investment in retail business, infrastructure, financial products and manufacturing of industrial goods.

With over 200 offices and subsidiaries in approximately 90 countries worldwide and a network of over 1,200 group companies, MC employs a multinational workforce of approximately 80,000 people.

For more information on MC's business groups and their activities, please visit the following link: http://www.mitsubishicorp.com/jp/en/bg/



3. MC's Philosophies and Principles

<u>The Three Corporate Principles</u> – Corporate Responsibility to Society; Integrity and Fairness; and Global Understanding through Business – established early in MC's history, serve as MC's core philosophy. Building upon these Principles, MC's <u>Corporate Standards of Conduct</u> lay down a set of key, high-level commitments which form the basis of MC's compliance and risk management systems.

Furthermore, MC's <u>Code of Conduct</u> provides a set of rules based on both national and international standards to ensure that MC's employees are upholding the highest level of ethical conduct in their day-to-day business.

4. MC's Commitments in Relation to Slavery and Human Trafficking

MC is committed to respecting human rights and strives to ensure that its business activities do not cause or contribute to adverse human rights impacts, including slavery and human trafficking. This commitment is expressed through a variety of channels:

- MC's <u>Social Charter</u> states that MC "will fully respect human rights" and "will also fully respect fundamental labor rights and endeavor to ensure the provision of safe and healthy working environments."
- MC's <u>Basic Stance on Human Rights</u> affirms MC's commitment to various international standards including the Universal Declaration of Human Rights, the ILO International Labor Standards and the Voluntary Principles on Security and Human Rights.
- MC is a signatory of the <u>UN Global Compact</u>, declaring MC's commitment to the 10 universal principles in the fields of human rights, labor, environment and anti-corruption. Principle 4 of the Compact states that MC should strive for "the elimination of all forms of forced and compulsory labor."
- MC has identified 7 Key Sustainability Issues (Materiality) for MC's sustainable growth as mileposts to help MC realize the simultaneous generation of economic value, societal value and environmental value. Through "Procuring and Supplying in a Sustainable Manner" as one of the Key Sustainability Issues, MC will continue to implement a sustainable approach to procurement and supply operations while taking into account environmental and social factors not only in MC's own business but also throughout the supply chain.
- MC's commitment to respect and uphold human rights also extends throughout the



supply chain. In order to convey this stance to suppliers, MC created the Mitsubishi Corporation Policy for Sustainable Supply Chain Management which all suppliers are expected to understand, embrace and abide by. Article (1) of the Policy states that "suppliers shall employ all employees of their own free will with no employee being subject to forced or bonded labor." The Policy goes on to further address issues such as child labor, freedom of association and suitable remuneration. In FY2017, MC revised the Policy to clarify and reinforce the company's position on issues such as the right of employees to engage in collective bargaining, prohibition of excessive overtime, and environmental management.

5. MC's Activities in FY2017 in Relation to Prevention of Slavery and Human Trafficking

A) Training and Awareness Raising

MC's policies and guidelines, including those related to respecting human rights through its businesses and supply chains, are communicated to all new recruits and reinforced at various internal training sessions on a regular basis. These policies and guidelines are also conveyed to employees of overseas businesses and affiliated companies at various internal training seminars on a regular basis.

In addition, content related to child labor and the Act are incorporated into an elearning program which all executives and employees are required to take every year, in order to cultivate a better understanding toward slavery and human trafficking in each of the employees.

For a description of MC's training programs and their features, please see the following link: http://www.mitsubishicorp.com/jp/en/csr/work/feature.html

B) Loan and Investment Proposal Screening

In order to ensure that the direct business operations and relationships that MC enters into do not cause or contribute to adverse human rights impacts, all loan and investment proposals are vetted through an internal screening process which considers not only financial and legal risks but also environmental, social and governance (ESG) factors including human rights. MC's ESG screening takes into account various standards which emphasize the importance of human rights. The standards include the International Finance Corporation (IFC) guidelines and the



Guidelines for Confirmation of Environmental and Social Considerations published by the Japan Bank for International Cooperation (JBIC). Further details are available at the following link: https://www.mitsubishicorp.com/jp/en/csr/management/framework/

C) Supply Chain Management

MC also strives to ensure that it does not contribute to adverse human rights impacts throughout the supply chain. As part of these efforts, MC conducts regular assessments of suppliers in industries where human rights risks including slavery and human trafficking are considered to be particularly prevalent, such as agricultural produce and apparel.

In FY2017, in order to enhance efficiency, MC updated its assessment process by tailoring the annual supplier survey to reflect the diversity of each business.

Furthermore, MC incorporated a more robust system to identify high-risk suppliers that require follow up and/or site visits.

Based on the results of this assessment, MC follows up with its suppliers to confirm whether MC's policies are being upheld. In the event that potential or actual adverse impacts are identified, or further improvement is deemed necessary, MC commits to engaging with suppliers to ensure that corrective measures and improvement plans are implemented. Should suppliers fail to take the necessary steps to cease or prevent the adverse impacts identified, MC will reevaluate its business relationship with the supplier. The details of MC's Supply Chain Management are available at the following link: http://www.mitsubishicorp.com/jp/en/csr/management/supplychain.html

6. Looking Ahead

Within the context of its broader human rights commitments, MC recognizes the importance of maintaining constant vigilance to identify and address any impacts associated with slavery and human trafficking throughout its global operations and supply chains. In recognition of the salience of these issues, MC is committed to continuing to enhance its capacity to identify, prevent and mitigate any actual or potential impacts in this field.



7. Approval by MC's Board of Directors

I, Iwao Toide, hereby certify that the information contained in the above FY2017 Slavery and Human Trafficking Statement is factual and has been approved by Mitsubishi Corporation's Board of Directors.

August 17, 2018

(Mr.) Iwao Toide

Executive Vice President, Member of the Board

Mitsubishi Corporation