

FY2018 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 FY2018 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 (FY2018) 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. Masakazu Sakakida, 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 through its 10 Business Groups: Natural Gas, Industrial Materials, Petroleum & Chemicals, Mineral Resources, Industrial Infrastructure, Automotive & Mobility, Food Industry, Consumer Industry, Power Solution and Urban Development. MC's current activities have expanded far beyond its traditional trading operations to include project development, production and manufacturing operations, working in collaboration with our trusted partners around the globe.

With over 180 offices and subsidiaries in approximately 90 countries worldwide and a network of around 1,400 group companies, MC employs a multinational workforce of approximately 77,000 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

The Three Corporate Principles – 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 Corporate Standards of Conduct 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 <u>7 Key Sustainability Issues (Materiality)</u> 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 (hereinafter "the Policy") 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.

MC's Activities in FY2018 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: http://www.mitsubishicorp.com/jp/en/csr/management/

C) Supply Chain Management

MC strives to ensure that it does not contribute to adverse human rights impacts throughout the supply chain. As part of these efforts, MC has established the Policy and is made available to MC's suppliers.

In addition, MC conducts regular assessments of suppliers in industries where human rights risks including slavery and human trafficking are considered to be particularly prevalent. Based on the results of this assessment, MC follows up with its suppliers to confirm whether the Policy is 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.

Since it is becoming more essential for suppliers to understand, embrace and abide by the Policy, in FY2018, MC reviewed the process of sharing the Policy with suppliers in order to further convey the company's fundamental position on the themes addressed in the Policy. The results of this review will allow MC to strengthen communication with its suppliers, and suppliers will be able to more easily and confirm the contents of the Policy as well as continuously monitor the status of their compliance with the Policy. Furthermore, MC incorporated a more robust system to monitor its suppliers from a governance and operation point of view. Based on this monitoring, MC has implemented additional surveys, on-site inspections and other measures for a number of suppliers. The level of communication with suppliers achieved through these surveys and site visits provides a valuable opportunity to deepen the suppliers' understanding of MC's stance on sustainability. It also gives MC the opportunity to deepen communication with each supplier and provide them with training and assistance as necessary.

Moreover, MC has developed an internet-based System for Sustainable Supply Chain Survey (hereinafter "the System") in FY2018. The System will be launched in FY2019, and will enhance accessibility of the Policy and survey for suppliers, as well as allow MC to efficiently monitor the situation of its supply chains in real time and take



necessary corrective measures in a timely fashion.

In FY2018, MC conducted its annual survey for FY2017, and replies were received from 332 companies in 30 countries and regions including China, Myanmar, and Thailand. In the past, the results of this survey have been shared with stakeholders via the ESG Data Book. From FY2018, MC has begun disclosing the number and percentage of suppliers the company is working with to share concerns, solve issues, etc. in order to increase transparency and share progress with all stakeholders.

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, Masakazu Sakakida, hereby certify that the information contained in the above FY2018 Slavery and Human Trafficking Statement is factual and has been approved by Mitsubishi Corporation's Board of Directors.

July 22, 2019

Masakazu Sakakida

Executive Vice President, Member of the Board

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Mitsubishi Corporation