

Mitsubishi Estate Group UK Modern Slavery Act Statement

Mitsubishi Estate Co., Ltd. (hereinafter, "the Company") has issued this statement to comply with Article 54 of the UK Modern Slavery Act 2015. The aim is to identify slavery and human trafficking risks in the Mitsubishi Estate Group (hereinafter, the "Group") and its supply chain. The statement also outlines the Company's initiatives to prevent and mitigate these risks. The statement covers fiscal 2018, the year ending March 31, 2019.

1. Business Overview and Organizations

The Group operates in nine segments: Business Development Consulting and Solutions Group, Office Building Business, Lifestyle Property Business, Residential Business, International Business, Investment Management Business, Architectural Design and Engineering, Hotel and Airport Business, and Real Estate Services. It has 9,439 employees, 221 consolidated subsidiaries and sites in Japan, the U.S., the U.K., China, Singapore, and elsewhere.

In the UK, MEC UK (now Mitsubishi Estate London Limited) was established in 1986. It has been developing top-quality buildings in central London and expanded its operation into continental Europe with the acquisition of a Paris office building in 2014.

For more information on the Company's business areas, visit our website.

Corporate Information:

<https://www.mec.co.jp/e/about/index.html>

Group Companies:

<https://www.mec.co.jp/e/company/group/field.html>

Business Segments:

<https://www.mec.co.jp/e/business/index.html>

Financial Information:

<https://www.mec.co.jp/e/investor/financial/highlight/segment.html>

History:

<https://www.mec.co.jp/e/company/history/index.html>

2. Philosophy of the Mitsubishi Estate Group

Based on the Spirit of Mitsubishi: The Three Principles, which are guiding principles for the entire Mitsubishi Group, the Mitsubishi Estate Group has established a mission to contribute to society through urban development.

In order to carry out this mission, the Mitsubishi Estate Group implemented the Code of

Conduct and Guidelines for Conduct.

Philosophy and Policy:

<https://www.mec.co.jp/e/csr/policy/system/index.html>

3. Supply Chain Overview

The Group obtains products and services from providers worldwide, and it has about 5,000 major suppliers, with which it has ongoing relationships.

They include facility management providers, construction contractors, goods suppliers, and personnel agencies (reception and event staff).

4. Policies and Structures to Prevent Slavery and Human Trafficking

In its businesses and supply chain, the Group has established a corporate human rights policy to identify, prevent and mitigate slavery and human trafficking risks. The Group's intranet is used to make employees aware of and help them understand the corporate human rights policy. Established to advance company-wide human rights initiatives, the Human Rights Education & Diversity Promotion Committee is striving to ensure human rights are respected across the Group.

The Group supports the principles of the United Nations Global Compact, which the Company signed in 2018.

In 1979, the Company set up the Tokyo Industrial Federation for Human Rights, followed by the Mitsubishi Human Rights Enlightenment Council in 1983. These are voluntary organizations that seek to solve various human rights issues from the corporate perspective, including measures to eliminate discrimination against the *buraku* group in Japanese society. For about 40 years, the company has played an active and central role. In 1980, the Company joined the Corporate Federation for Dowa and Human Rights Issues, Osaka, as part of ardent efforts to help resolve human rights issues.

The following Group guidelines and policies apply to all employees.

A) Mitsubishi Estate Group Guidelines for Conduct

In order to realize the spirit of the Code of Conduct, "who we aspire to be, how we aspire to be perceived, and what we should do in order to achieve these aspirations", the Group established these guidelines as specific standards for behavior. One of the most important values in the guidelines is "respect for human rights and diversity."

Guidelines for Conduct:

<https://www.mec.co.jp/e/company/charter/index.html>

B) Mitsubishi Estate Group Human Rights Policy

The Mitsubishi Estate Group Human Rights Policy was created in April 2018, based on the United Nations Guiding Principles on Business and Human Rights.

Human Rights Policy:

https://www.mec.co.jp/e/csr/pdf/human_rights_policy.pdf

C) Mitsubishi Estate Group CSR Procurement Guidelines

Major first-tier suppliers having contracts and conducting business with the Group are informed of the Mitsubishi Estate Group CSR Procurement Guidelines, which were established in 2016 and include respect for human rights. We believe that CSR procurement is essential for allowing the Group to cooperate with business partners and expand CSR efforts through business activities, across the supply chain.

CSR Procurement Guidelines:

<https://www.mec.co.jp/e/csr/partners/index.html>

5. Human Rights Due Diligence

Initial study on human rights risks was conducted by first looking at Group-wide issues, before turning to area-specific issues. These were analyzed by dividing the business in three areas: real estate development business, international business, and hotel business. Then the human rights risks were investigated by specialist consultants and lawyers through document-based research.

A) Efforts in the Group:

While safeguarding employee health against overwork, the Group is also promoting work-life balance, and preventing workplace harassment.

Human Resource Development:

<https://www.mec.co.jp/e/csr/employees/index.html>

B) Efforts in the Real Estate Business

The real estate development business covers a wide market that ranges from office buildings and commercial facilities to residences. As a single company, our activities have limited impact on the supply chain. Therefore, we spoke with real estate development companies and general construction companies, to organize a study group to promote measures to protect human rights in the industry. The Construction and Real Estate Human Rights Due Diligence Study Group was founded on September 21, 2018 by eight companies including Mitsubishi Estate.

News Release: Construction and Real Estate Human Rights Due Diligence Study Group Launched (Japanese only)

https://www.mec.co.jp/j/news/archives/mec180921_duediligence.pdf

In the study group meetings, opinions have been exchanged with lawyers, NGOs and other experts to share international human rights awareness and identify human rights risks in the industry. The study group decided to explore the following two human rights topics.

1) Work environments for foreign technical intern trainees on construction sites
Japan's technical intern training system for foreigners seeks to transfer skills, technology, and knowledge to workers who come from overseas. However, problems have been reported at some construction companies taking these foreign interns, including assignment of work that does not match the training plan, excessive working hours, and unpaid wages. The study group will consider measures to support technical intern trainees working on construction sites.

2) Use of illegally harvested wood for concrete formwork
It has been noted that plywood from Malaysia and Indonesia can contain illegally harvested timber, which causes problems such as exploitation of indigenous land, environmental destruction, and corruption caused by improper relationships between logging companies, and the government. The study group will investigate measures to check the origin of wood used in concrete formwork at construction sites.

C) Efforts in the International Business

Human rights due diligence in the International Business will be focused on Asian countries. A document-based investigation was carried out concerning the general

human rights situation and cases of human rights violations reported in Vietnam, Singapore, China, Myanmar, Thailand, and Indonesia.

D) Efforts in the Hotel Business

Royal Park Hotels and Resorts Co., Ltd. manages 12 hotels in Japan. It has decided to adopt the use and sale of fair trade products and has begun serving fair trade coffee and wine, mainly in its full-service hotels. In addition, the company provides information about fair trade products to its tenant restaurants.

Corporate profile for Royal Park Hotels and Resorts Co., Ltd. (Japanese only)

<https://www.royalparkhotels.co.jp/corporate/index.html>

News release: Mitsubishi Estate Group's Royal Park Hotels to Adopt Biodegradable Straws and Fair Trade Certified Wine and Coffee (Japanese only)

https://www.mec.co.jp/j/news/archives/190801_SDGs_RPH.pdf

6. Compliance Help Line

A help line has been set up by the Group as a way for employees to report or discuss any potential compliance issues. It is available to Group full-time, temporary, and part-time employees. In fiscal 2018, the Mitsubishi Estate Group Help Line received 63 calls. Investigation and fact confirmation was carried out concerning each report that was received, and appropriate response measures were taken as necessary to improve the workplace environment. The Company's Legal & Compliance Department handles the incoming reports received through an external contractor. It works with the Group companies that are the subject of the reports, while protecting the privacy of the callers and whistleblowers and making sure they receive no unfavorable treatment in the workplace as a result. A dedicated compliance help line has also been set up for the use of suppliers and other business partners in Japan.

Compliance Promotion:

<https://www.mec.co.jp/e/csr/compliance/compliance2/index.html>

7. Education and Training

The Company provides human rights awareness training to ensure that human rights are always respected, as required by the Mitsubishi Estate Group Guidelines for Conduct. In addition to level-specific instruction, various kinds of training are carried out to deepen employee understanding.

- A) Human rights lectures are organized for all executives each year, including the president and all directors, department managers, and presidents of Group companies. After the creation of the Mitsubishi Estate Group Human Rights Policy in fiscal 2018, the annual lecture given by an expert was on "business and human rights," and was attended by 90 people.
- B) Lectures on business and human rights were also given to employees in fiscal 2018, as part of level-specific training. This included the Group's joint new employee training (335 participants) and new management training (24 participants). In addition, 38 employees learned about international human rights issues through a summer course on ending discrimination against outcast *buraku* people by the Buraku Liberation and Human Rights Research Institute.
- C) The Mitsubishi Estate Group Guidelines for Conduct were revised on April 1, 2018. To ensure that all Group employees are aware of and understand the new document, the Guidelines for Conduct Explanatory Guide was issued. It explains the *UN Guiding Principles on Business and Human Rights* and measures to prevent child and forced labor.

Ongoing Human Rights Programs:

<https://www.mec.co.jp/e/csr/employees/variety/index.html>

8. Future Initiatives

Based on the *UN Guiding Principles on Business and Human Rights*, the Group is continuing to identify, prevent and mitigate risks in its business and supply chain. The following specific activities have been planned.

- A) In compliance with laws, measures will be maintained to promote employee work-life balance and to prevent health impairment caused by overwork.
- B) The Construction and Real Estate Due Diligence Study Group will examine specific human rights due diligence methods concerning two topics: Technical intern trainees on construction sites, and concrete formwork.
- C) For business sites outside Japan, specific approaches will be considered based on the results of a human rights risk survey carried out in fiscal 2018.

This statement was reviewed and approved at a management meeting of the Company.

September 30, 2019

Junichi Yoshida

President & Chief Executive Officer

Mitsubishi Estate Co., Ltd.