

Mitsui Kinzoku Group Statement on U.K. Modern Slavery Act

We make this Statement pursuant to Section 54 of the United Kingdom (UK) Modern Slavery Act 2015 to identify action we have taken on a Mitsui Kinzoku Group-wide basis during the financial year ending March 31, 2025, to prevent slavery and human trafficking from occurring in our business or our supply chain. Mitsui Kinzoku Group has adopted a Group-wide approach to our human rights commitment and makes this Statement on behalf of a group company subjected to the Act.

Company Overview and Supply Chain

Mitsui Kinzoku Group is engaged in the manufacturing and selling of functional engineered materials and electronic materials, nonferrous metal smelting, mining, precious metal recycling, raw material related businesses, and the manufacturing and selling of automotive parts/components, etc.

We procure materials and component parts for those products from suppliers located throughout the world.

Mitsui Kinzoku Group has approximately 80 sites located in Japan, China, Taiwan, Thailand, India, Indonesia, Vietnam, Malaysia, Peru, Mexico, the United States, the United Kingdom, France, and Morocco. As of March 31, 2025, Mitsui Kinzoku Group had approximately 13,000 employees. Mitsui Kinzoku Group's operation in the United Kingdom is represented by Mitsui Components Europe Ltd, a subsidiary incorporated in Wales.

Applicable Corporate Policies

Mitsui Kinzoku Group prepares and distributes applicable policies to its employees and suppliers to ensure that slavery and human trafficking are not taking place in any part of its business or supply chain.

Mitsui Kinzoku Group's applicable policies include:

- Basic Sustainability Policy (including Code of Conduct)

<https://www.mitsui-kinzoku.com/en/csr/approach/>

- Human Rights Policy

<https://www.mitsui-kinzoku.com/en/csr/society/humanrights/>

- Procurement Policy and Responsible Minerals Sourcing Policy

<https://www.mitsui-kinzoku.com/en/csr/supplychain/>

We comply with universal principles regarding human rights and labour practices worldwide. In addition to complying with laws and regulations, our Basic Sustainability Policy (including the Code of Conduct) and Human Rights Policy stipulate respect for basic human rights and oppose child labour and forced labour.

We request all our suppliers, who play an important role in the Mitsui Kinzoku Group's production and

services, to understand and put into practice the Mitsui Kinzoku Group Procurement Policy.

Regarding covered-minerals originating in Conflict Affected High-Risk Areas (CAHRAs), we do not use minerals involving any injustices including direct/indirect contribution to conflict and human rights abuses such as child labour and forced labour.

Risk Assessment

We have adopted an approach to prevent slavery and human trafficking in our business and supply chain as a series of efforts to respect human rights.

We conduct human rights risk assessment in our business and supply chain. Mitsui Kinzoku Group, as a company engaged in business related to the mineral supply chain, recognizes that there are risks in our business and supply chain and risks specific to the mining business.

Due Diligence Framework

The CSR Committee Chairperson (the President) is identified as the highest responsible person for the human rights management of Mitsui Kinzoku Group. The Senior Executive Officer in charge of supply chain is appointed as the Chairperson of the Supply Chain Committee.

For our group manufacturing sites, we conduct a survey using the Self-Assessment Questionnaire, which includes slavery and human trafficking. Based on the survey results, we conduct on-site hearings. The results are fed back to each site, based on which corrective measures will be taken. For sites engaged in mining, we conduct a survey which focuses on human rights issues specific to the mining business.

We request our suppliers to understand and implement the Procurement Policy. In addition, we have identified suppliers which could have a significant impact on our business as “critical suppliers”. We request the critical suppliers to submit the Supplier Self-Assessment Questionnaire (hereinafter, called “Suppliers SAQ”) and assess their conditions relating to the issues of human rights & labour (including slavery, human trafficking, child labour, non-discrimination, harassment, and working environment), health & safety, environment, and ethics.

Effectiveness and Performance Review

In FY 2024, we conducted surveys at three overseas sites of the Mitsui Kinzoku Group. While there were no cases of slavery and human trafficking, corrective actions were taken to address identified human rights issues. In addition to these standard surveys, in FY 2023, we conducted individual interviews with foreign technical interns and met with relevant stakeholders regarding 11 former and current foreign technical interns recruited under the Technical Intern Training Program (TITP) in Japan. The study, which aimed to determine the costs the interns had paid in the recruitment process before coming to Japan, was completed in FY 2024.

Taking account of the ILO's principles and opinions by a third-party expert, we identified and reimbursed the amount that employers should have covered out of the total the interns had paid. To prevent a recurrence, we formulated a draft of detailed rules concerning employment of foreign-national employees in the Group.

We have started supply chain management from FY 2018. In FY 2024, we conducted the Suppliers SAQ for the 59 critical suppliers, and 56 (94.9%) of them responded to it. There were no cases of slavery and human trafficking among these suppliers. In FY 2025, we plan to identify critical suppliers through risk assessment of the supply chain and implement Suppliers SAQ.

Grievance Mechanism

Mitsui Kinzoku Group receives internal reports and consultations concerning human rights through the Mitsui Kinzoku Hotline. For external stakeholders, we have the Compliance Consultation Desk and the Environmental and Social Risks Consultation Desk on our website.

- Compliance Consultation Desk and Environmental and Social Risks Consultation Desk

<https://www.mitsui-kinzoku.com/en/contact/>

Training

Mitsui Kinzoku Group provides our employees with human rights training in order to raise awareness of human rights issues, including slavery and human trafficking, and to inform them of our human rights policy. In FY 2024, 4,218 employees attended the training.

We conduct training on our procurement policy, supply chain management, and responsible mineral sourcing for employees, including those responsible for procurement. In the training, we share information about the risks in our supply chain, including forced labour and human trafficking. In FY 2024, a total of 648 employees attended the supply chain management training. We engage with C-ranked suppliers of the Suppliers SAQ to explain identified issues and discuss improvements. In FY 2024, we engaged with 12 suppliers.



NOU Takeshi

President, Representative Director

September 2025