

## **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, 2020 to prevent slavery and human trafficking from occurring in our business or our supply chains. 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 sale of functional engineered materials and electronic materials, nonferrous metal smelting, mining, precious metal recycling, raw material related businesses, and the manufacturing and sale 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, South Korea, Thailand, India, Indonesia, Vietnam, Malaysia, Peru, Mexico, the United States, the United Kingdom, France, and Morocco. As of March 31, 2020, 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 CSR 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/society/supplychain/>

We comply with universal principles regarding human rights and labour practices worldwide. In addition to complying with laws and regulations, our Basic CSR 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, human rights abuses such as child labor and forced labor.

### **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 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 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 supply chain management.

For our group manufacturing sites, we conduct a survey using the Self-Assessment Questionnaires, 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 2019, we conducted surveys at 3 sites of the Mitsui Kinzoku Group in Japan, one site in China, and two sites in Taiwan. There were no cases of slavery and human trafficking. In FY 2020, we will conduct the surveys in at least six sites in Japan and two overseas. This plan may be changed or postponed due to the influence of the COVID-19 infection.

We have started the supply chain management from FY 2018. In FY 2019, we conducted Supplier Assessments using the Suppliers SAQ, and 425 suppliers answered. There were no cases of slavery and human trafficking among these suppliers. We will conduct the Suppliers SAQ to all 627 critical suppliers by the end of FY 2020.

### **Grievance Mechanism**

Mitsui Kinzoku Group receives internal reports and consultations concerning human rights from our stakeholders through the Mitsui Kinzoku Hotline and the Compliance Consultation Desk.

### **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 inform of our human rights policy. In Japan, human rights training including Code of Conduct is conducted as part of level-specific training, and approximately 180 employees attended in FY 2019. In addition, we conducted training at one domestic site and approximately 30 employees participated. At overseas sites, approximately 60 employees of two sites in Indonesia and one site in Malaysia participated in training, which was implemented sequentially as part of CSR training.

We conduct training on our procurement policy and supply chain management for employees in charge of procurement, and approximately 180 employees participated in FY 2019. In the training, we share information about the risks in our supply chain, including forced labor and human trafficking. Suppliers are made aware of procurement policies at procurement policy briefings and asked to work on the items specified in the procurement guidelines.



Keiji Nishida

President, Representative Director

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