FY2015 Anti-Slavery and Human Trafficking Statement

Mitsui & Co., Ltd. (‘Mitsui’) and its affiliates have produced this Anti-Slavery and Human Trafficking Statement for FY2015, its fiscal year ended 31 March 2016, in response to section 54 of the UK Modern Slavery Act 2015 (the ‘Act’). Mitsui has prepared this statement based on the resolution of a board meeting of Mitsui held on 7 September 2016.

Utilising its global operating locations, network and information resources, Mitsui conducts multiple business activities ranging from product sales, worldwide logistics and financing, through to the development of major international infrastructure and other projects in the following fields: Iron & Steel Products, Mineral & Metal Resources, Infrastructure Projects, Integrated Transportation Systems, Chemicals, Energy, Food, Food & Retail Management, Healthcare & Service, Consumer Business, IT & Communication Business, and Corporate Development Business. For more information on Mitsui’s activities, please visit the following link:

Mitsui sets forth and supports various policies and procedures directed at protecting human rights, including avoiding human rights abuses through slavery and human trafficking, and Mitsui has taken steps to combat these issues, as explained below.

1. Mitsui’s Sustainability Report: This states that: “Mitsui has built diverse value chains throughout the world and provides a wide range of functions and services. In conducting business globally, we are fully aware of our responsibilities, such as complying with laws, respecting human rights, and maintaining safe and sanitary working conditions, giving comprehensive consideration to reduction of the environmental burden, and ensuring safety and consumer confidence. Together with our business partners, we endeavor to solve various issues present in our supply chains in order to meet society’s expectations.” and that “Being aware of our role as a member of the international community, we will work to understand the culture, traditions, and practices of each country and region. We will also work to ensure that human rights are respected in the supply chain, and that there is no discrimination based on race, beliefs, gender, social status, religion, nationality, age, or mental or physical abilities. We will take action to
rectify labor practices that violate human rights, such as forced labor and child labor.

Mitsui’s Sustainability Report is available through the following link:

2. Respect for human rights is stipulated in Mitsui’s “Basic CSR (Corporate Social Responsibility) Policy” and Mitsui’s “Business Conduct Guidelines for Employees and Officers”, which are available on Mitsui’s website.

3. Mitsui supports the Universal Declaration of Human Rights and the ILO Core Labour Standards as defined in eight conventions across four fields, and Mitsui responds to international guidelines, including ILO Convention 169 concerning consideration for indigenous peoples, and guidelines concerning the use of security companies. Mitsui’s position on these international standards is available on its website.

4. In October 2004, Mitsui pledged its support for the United Nations Global Compact. Mitsui has been participating as a member of the Global Compact Network Japan and Mitsui continually strives to comply with the Global Compact’s principles as part of Mitsui’s own corporate guidelines. Currently, Mitsui conducts a company-wide survey every other year in order to check compliance with the Global Compact principles, and is working to comply with and to put into practice those principles on a global group basis. As just one example, Mitsui has implemented a CSR e-learning course about human rights. The course has been completed by 98.3% of the 5,000 targeted employees working in Japan. (More information about this is included in the Mitsui Sustainability Report 2016.)

5. Furthermore, respect for human rights has been identified in “Five Material Issues in the CSR Field” established by Mitsui, which aims to find solutions for related societal issues through its business activities.

6. In December 2007, Mitsui developed its “Supply Chain CSR Policy”. Mitsui has revised this policy twice to reflect social changes. Mitsui has also informed suppliers about this policy and its key aspects, and has sought to check that they
understand this policy and its importance.

7. Mitsui plans to implement its Supply Chain CSR Policy further based on the following approaches:
   (1) Company-wide uniform supplier communication forms
   (2) Supplier questionnaire surveys
   (3) On-site surveys of suppliers

8. Mitsui regularly implements training and other activities designed to enhance employee awareness of such CSR issues and prevent related problems. In the fiscal year ended 31 March 2016, Mitsui implemented other CSR e-learning courses, which included the Supply Chain CSR Policy. These e-learning courses have been completed by 92.8% of the 8,806 Mitsui & Co. employees working in Japan and overseas offices. (More information is included in Mitsui’s Sustainability Report 2016.)

9. Mitsui seeks to prioritize its efforts in tackling modern slavery in any of its business activities that Mitsui identifies as potentially at risk of infringing this policy so that, where necessary, Mitsui can request its suppliers to have a better understanding of our Supply Chain CSR Policy and to implement improvements and remedies for identified risks.

10. Previously, Mitsui has conducted spot checks on some of its affiliate companies through interviews and other methods to understand better their level of compliance with its Supply Chain CSR Policy, and Mitsui will continue these efforts as required.

11. Internal audits are conducted on Mitsui Headquarters’ business units and divisions and offices under their supervision, domestic and overseas branches and offices, organizations under the regional business unit COO’s supervision, overseas subsidiaries, corporate staff divisions, and affiliated companies. Mitsui’s internal control framework is also the subject of audit. These audits include assessments concerning the implementation of risk controls based on the recognition of risks in each of Mitsui’s businesses. If necessary, audits also involve related items, such as respect for basic human rights.
12. Whistle-blowing systems are available to the employees of Mitsui Headquarters and some of its affiliates to report situations that could breach Mitsui’s “Basic CSR Policy” and “Business Conduct Guidelines for Employees and Officers”.

13. “Mitsui’s Corporate Governance and Internal Control Principles” provide that, based on the general principle of the autonomy of its affiliates, Mitsui Headquarters will exercise suitable management of affiliates by exercising its legal and/or contractual rights as an investor to enable the management of its affiliates to maintain and operate a sound system of internal rules and regulations at suitable levels.

September 30, 2016

Hiroyuki Kato
Representative Director,
Executive Vice President
Mitsui & Co., Ltd.