



## **FY2018 Anti-Slavery and Human Trafficking Statement**

Mitsui & Co., Ltd. ('Mitsui') has produced this Anti-Slavery and Human Trafficking Statement for FY2018, the fiscal year ended 31 March 2019, in response to [Section 54 of the UK Modern Slavery Act 2015](#) (the 'Act'). This statement was approved by the board of Mitsui in September 2019.

Utilizing its global operating locations, network and information resources, Mitsui conducts diverse business activities ranging from product sales, worldwide logistics, and financing, through to the development of major international infrastructure and other projects in the following business areas : Metals, Machinery & Infrastructure, Chemicals, Energy, Lifestyle, and Innovation & Corporate Development. For more information on Mitsui's activities, please visit the following links:

Corporate Profile: <https://www.mitsui.com/jp/en/company/outline/profile/>

Business Activities: <https://www.mitsui.com/jp/en/company/business/>

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 has built diverse value chains throughout the world and provides a wide range of functions and services. Mitsui is active at all stages of the supply chains, from upstream to downstream, and has as many as 20,000 business partners. 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. Furthermore, being aware of our role as a member of the international community, we work to understand the culture, traditions, and practices of each country and region in which we conduct business, and also work to ensure that there is no discrimination based on race, beliefs, gender, social status, religion, nationality, age, or mental or physical abilities. We take action to rectify labor practices that violate human rights, such as forced labor and child labor and observe the

statutory minimum age for admission to employment. Mitsui recognizes its responsibilities that surpass legal compliance in respect to its business activities and works to ensure the protection of human rights in its supply chains.

For more details, please refer to [“Promotion of Supply Chain Management”](#) and [“Respect for Human Rights”](#) in Mitsui’s Sustainability Report 2019.

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. Furthermore, Mitsui’s [Group Conduct Guidelines “With Integrity”](#) also state that “We will comply with laws and regulations, and act to the highest ethical standards” to share understanding of the basic philosophy on integrity across the entire group and published the guidelines internally and externally. For more details, please refer to the Mitsui 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 in Mitsui’s Sustainability Report 2019 [“Respect for Human Rights”](#).
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. For more details, please refer to the Mitsui [Website](#).
5. 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. Moreover, in order to enhance sensitivity toward human rights and labor related issues in the supply chains, we implement employee awareness-raising seminars and activities regularly, as preventive measures before problems actually happen.

6. Mitsui implements its Supply Chain CSR Policy based on the following approaches. For further details, please refer to [“Promotion of Supply Chain Management”](#) in the Sustainability Report 2019.
  - (1) Mitsui sends letters (in Japanese, English, Chinese, French, Spanish, and Portuguese) to all of our suppliers requesting their understanding and cooperation regarding our Supply Chain CSR Policy, in a move to ensure that Mitsui’s suppliers are fully aware of and cooperate with this policy. In addition, we conduct internal examinations in alternate years, to verify that the letters were dispatched to the suppliers.
  - (2) Mitsui regularly conducts questionnaire surveys with selected major suppliers to confirm the status of their adherence to our Supply Chain CSR Policy and to confirm whether they have their own CSR policies.
  - (3) Mitsui conducts supplier on-site surveys in order to carry out interviews with responsible persons and check the situation at the operation site in accordance with a pre-prepared checklist for compliance with the Supply Chain CSR Policy.
7. When Mitsui embarks on new business investment project, business divisions subject them to environmental, social, and governance (ESG) impact assessments, using ESG due diligence checklists that consider environmental and societal risks based on international standards. For more details, please refer to [“Promoting the Environmental Management”](#) in Mitsui’s Sustainability Report 2019.
8. 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.
9. For many years, Mitsui has conducted surveys on some of its affiliate companies through interviews and other methods to better understand their level of compliance with its Supply Chain CSR Policy, and Mitsui will continue these efforts.
10. Internal audits are conducted for 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 trading 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 business activities. If necessary, audits also involve related items, such as respect for basic human rights.

11. 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"](#).
12. ["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 appropriate levels.

September 13, 2019



Shinsuke Fujii  
Representative Director,  
Executive Vice President  
Mitsui & Co., Ltd.