Preventing illegal use of personal information by providing cybersecurity services for enterprises

In recent years, cyber attacks have become more sophisticated and ingenious, leading to an increased leakage risk for company-held data, including information identifying individuals. Such stolen data are actually being sold through sites on the so-called “dark web” which are not accessible by regular channels. In view of this situation, the amended Act on the Protection of Personal Information which took effect in Japan in 2017 introduced provisions that in principle prohibit the collection of information on race, creed, medical history, criminal record, etc. without the concerned individual’s consent, in order to prevent unfair discrimination and prejudice. Such measures are aimed at strengthening the protection of human rights.

According to a survey conducted by the Ministry of Economy, Trade and Industry in 2016, the number of information security experts in Japan is lower than it should be by some 132,000 people. This personnel deficit is projected to increase to 193,000 by the time of the Tokyo Olympics in 2020. The fostering of human resources capable of responding to cyber attacks is therefore an urgent issue. Also, compared to other countries, it is evident that Japan lags behind on this issue. As of April 2017, there were 75,312 persons in the U.S. with Certified Information Systems Security Professional (CISSP) credentials, an internationally recognized qualification, while there were only 1,720 such persons in Japan.

In order to address this issue, Mitsui Bussan Secure Directions, Inc. harnesses the expertise of highly skilled cybersecurity professionals to offer a wide range of solutions including vulnerability assessment, illegal access monitoring, high-level security platform implementation and management, malware analysis, and more. In addition, through the discovery and reporting of vulnerabilities in widely used products and open source products, along with technical analysis of malware with the potential to cause significant harm, we are aiming to proactively prevent attacks that exploit vulnerabilities and unauthorized use of personal information. By doing so, we contribute to the creation of a society where human rights are fully respected and protected.
## Activities for FY Ended March 2017

<table>
<thead>
<tr>
<th>Support for International Standards</th>
<th>Business Activities</th>
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<tbody>
<tr>
<td>• Maintenance and improvement of living environments and local job creation through global business activities relating to water, power generation, and gas</td>
<td>• Collection of a commitment to comply with the Business Conduct Guidelines for Employees and Officers and the Standards for Discipline of the Employment Regulations from all the applicable employees and officers</td>
</tr>
<tr>
<td>• Support for the sale of RSPO (Roundtable on Sustainable Palm Oil) certified palm oil</td>
<td>• Implementation of compliance tests (e-learning) for persons who have not yet completed this process</td>
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<tr>
<td>• Provision of healthy menu choices in employee cafeterias (operated by AIM Services), and donation of school lunches for children in developing countries through Table for Two International, a non-profit organization (approx. 570,000 meals donated)</td>
<td>• Implementation of Compliance Review Week activities, including the dissemination of messages by the President and COOs, etc., as well as seminars, information-sharing, and discussions</td>
</tr>
<tr>
<td>• Collection of letters of agreement with the Supply Chain CSR Policy from 5,012 Japanese and overseas suppliers by Mitsui Bussan I-Fashion (MIF), and addition of new provisions to the policy in FY2016, including the prohibition of employment discrimination, respect for the right of collective bargaining, and the prohibition of excessive working hours</td>
<td>• Implementation of the Compliance Awareness Survey (for domestic employees and officers). Formulation and implementation of compliance activities based on the results of the Survey</td>
</tr>
<tr>
<td>• Bluesign® certification obtained for outdoor apparel fabrics supplied by MIF, based on compliance with standards that include consideration for the environment, freedom of association, and labor health and safety, as well as the elimination of child labor, forced labor, and discrimination</td>
<td>• Formulation of the plans for compliance activities for FY2017 based on the review of FY2016 activities undertaken by the Compliance Committee (twice annually)</td>
</tr>
<tr>
<td>• Publication of an anti-slavery and human trafficking statement in response to section 54 of the UK Modern Slavery Act 2015. (Mitsui, affiliated companies)</td>
<td>• Attendance at compliance meetings and seminars implemented by regional business units, etc.</td>
</tr>
<tr>
<td>• Continuation of an agreement with the Biratori Ainu Association and the town of Biratori in Hokkaido, providing for cooperation in efforts to ensure that Ainu culture is protected and handed down to future generations through Mitsui’s Forests, and signing of a related agreement with the Iwor Forest Development Group of the Nibutani Craft Cooperative Association, providing for cooperation in the development a forest environment for traditional Ainu cultural activities in the Mitsui-owned Saru Forest</td>
<td>• Promotion of compliance-related activities at overseas subsidiaries and affiliated companies, in line with initiatives by the parent company</td>
</tr>
</tbody>
</table>

## Theme Business Activities

### Promotion of Management for Human Rights

- Collection of a commitment to comply with the Business Conduct Guidelines for Employees and Officers and the Standards for Discipline of the Employment Regulations from all the applicable employees and officers
- Implementation of compliance tests (e-learning) for persons who have not yet completed this process
- Implementation of Compliance Review Week activities, including the dissemination of messages by the President and COOs, etc., as well as seminars, information-sharing, and discussions
- Implementation of the Compliance Awareness Survey (for domestic employees and officers). Formulation and implementation of compliance activities based on the results of the Survey
- Formulation of the plans for compliance activities for FY2017 based on the review of FY2016 activities undertaken by the Compliance Committee (twice annually)
- Attendance at compliance meetings and seminars implemented by regional business units, etc.
- Promotion of compliance-related activities at overseas subsidiaries and affiliated companies, in line with initiatives by the parent company
- Visits to key affiliated companies to provide advice on the development and operation of compliance activities
- Conveyance of alerting messages about compliance (via intranet, meetings, etc.). Sharing information about actual disciplinary cases through reporting lines
- Improvement of the effectiveness of expert advice about environmental and social risks provided through the Environmental & Societal Advisory Committee
Support for International Standards

Human Rights Initiatives

Conducting business globally in many countries and regions of the world, Mitsui considers the protection of human rights in accordance with international standards to be its sustainability management platform. Mitsui’s Basic CSR Policy states, “make prudent efforts to understand the culture, traditions, and customs of countries and regions around the world” and “recognize the significance and importance of the human rights contained in international standards.”

The “Business Conduct Guidelines for Employees and Officers of Mitsui & Co., Ltd.” prescribe and require Mitsui employees and officers to observe: full consciousness of their role as members of international society; understanding of and respect for the cultures, customs, and history of individual nations; protection of human rights; and eschewing any form of discrimination based on race, creed, gender, social status, religion, nationality, age, or physical or mental ability. Furthermore, regarding measures to prevent any kind of discrimination and sexual harassment, we are raising employee and officer awareness by providing compliance seminars and other opportunities tailored to each job level.

We also support various international standards, such as the Universal Declaration of Human Rights and the ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work.

Universal Declaration of Human Rights

The Universal Declaration of Human Rights is a common standard of objectives for all peoples and all nations to respect human rights and freedoms. The Declaration was proclaimed on December 10, 1948 at the third United Nations General Assembly and occupies an important position in the history of human rights.

Following this declaration, the International Covenant on Economic, Social and Cultural Rights (ICESCR) and the International Covenant on Civil and Political Rights ( ICCPR) were adopted by the 21st United Nations General Assembly on December 16, 1966. They both recognize the majority of the rights indicated in the Universal Declaration of Human Rights. Japan ratified both treaties in June, 1979.

Mitsui supports the Universal Declaration of Human Rights, the ICESCR and the ICCPR.

ILO Core Labour Standards

The International Labour Organization (ILO) was founded in 1919 as an international organization responsible for drawing up and overseeing international labor standards. The ILO is a tripartite agency that brings together representatives of governments, employers, and workers to shape programs together on the subjects of human rights, occupational safety and health, hiring policies, and the development of human knowledge for the adoption of ILO agreements and recommendations.

In 1998, the ILO established the ILO Declaration on Fundamental Principles and Rights at Work. As the basic rights of workers (ILO Core Labour Standards), they are defined in the 8 conventions in 4 fields (freedom of association and the right to collective bargaining C87/C98; the prohibition of all forms of forced labor C29/C105; elimination of the worst forms of child labor C138/C182 and non-discrimination in employment C100/C111).

Mitsui supports the 8 conventions constituting the ILO Declaration on Fundamental Principles and Rights at Work.

Respecting Indigenous Peoples

When conducting operations, Mitsui strives to comply with all laws of the applicable country or region, and to respect the human rights and cultures of its indigenous peoples in accordance with international standards such as the United Nations Declaration on the Rights of Indigenous Peoples and the Convention concerning Indigenous and Tribal Peoples in Independent Countries (ILO Convention: C169).

For example, in our forest resources business for pulp and paper manufacturing in Australia, we are exercising due diligence by assessing the level of impact that Mitsui’s projects might have on the indigenous Aboriginal population. As part of our research into available solutions in the event that any problems are discovered, we conduct advance surveys from the viewpoint of cultural protection to ensure that our operations will not destroy Aboriginal historical sites. In our iron ore mining operation in Brazil, we maintain close communication with the indigenous Parketêjê people to foster mutual respect.

In Japan, Mitsui has entered into agreements with the Biratori Ainu Association and with the town of Biratori in Hokkaido, where a part of Mitsui’s forests is located to cooperate in activities to protect, and pass on Ainu traditional culture through the conservation of forests.
Guidelines for Appointing a Security Firm

The UN Code of Conduct for Law Enforcement Officials was adopted in December 1979 so that the UN can promote and ensure that law enforcement authorities such as the police and the military in member countries take on appropriate roles as well as respecting and protecting human dignity. The Principles on the Use of Force and Firearms by Law Enforcement Officials was also adopted in August/September 1990 as the standard for the use of force and firearms by law enforcement officials.

Mitsui bases its appointment of security firms on these codes of conduct and principles.

Management System for Human Rights and Labor Conditions

Mitsui & Co. conducts an internal survey in alternate years concerning compliance with the UN Global Compact, to raise the awareness of management and employees regarding human rights and labor issues at its business units, corporate staff divisions, and domestic and overseas organizations (branch offices and consolidated subsidiaries).

1. Do you fully understand the UN Global Compact?
2. Have there been any violations of the 10 principles of the UN Global Compact? If so, report the details of the violation and what measures were taken to handle the situation.

As a consequence of this survey, if it is found that we have a unit, a division, or an organization that materially lacks an understanding of the UN Global Compact, we will take measures, such as providing additional training seminars.

In addition, we continue to hold e-learning courses and other training activities to remind employees of the importance of addressing and managing risks related to human rights and labor problems in the supply chain.

With regard to our main suppliers, we promote initiatives for improving our supply chain management by conducting supplier surveys which involve sending out questionnaires and carrying out on-site surveys based on a checklist. In the fiscal year ended March 2017, we sent questionnaires to 50 of our suppliers, and conducted on-site surveys at food material suppliers. Through these surveys, we confirmed their compliance with our Supply Chain CSR Policy, which covers human rights, labor conditions, and other aspects.

Moreover, through our participation in working groups of Global Compact Network Japan, such as the Human Rights Due Diligence (HRDD) Working Group and the Supply Chain Working Group, we are able to keep up-to-date with international trends related to human rights, and can make use of the information we obtain from other companies to enhance our sustainability promotion activities.

We continue to deepen our awareness of human rights and labor issues in reference to international guidance, such as the UN’s Guiding Principles on Business and Human Rights, by measures such as inviting outside experts to hold seminars.