

Respect for Human Rights

As Mitsui & Co. conducts business globally in many countries and regions around the world, we regard respect for human rights, in accordance with international standards, as the foundation of our sustainability management. We have emphasized respect for human rights in both the Mitsui & Co. Group Conduct Guidelines and the Business Conduct Guidelines for Employees and Officers of Mitsui & Co., Ltd., and we have implemented various initiatives.

Human rights initiatives in the corporate sector have become increasingly important in recent years. We recognize the need for human rights initiatives not only within Mitsui, but also across the entire supply chains. In August 2020, we formulated a Human Rights Policy to clarify our approach to human rights as the basis for initiatives in this area. This policy was approved by the Corporate Management Committee, and was reported to the Board of Directors meeting.

In accordance with its Human Rights Policy, the Mitsui & Co. group will respect human rights in its activities as a group. We also aim to promote respect for human rights in collaboration with our business partners.



P.5 Corporate Mission, Vision, Values



Mitsui & Co. Group Conduct Guidelines—With Integrity

Human Rights Policy

Policy

Mitsui & Co.'s mission is to “build brighter futures, everywhere” through realizing a better tomorrow for earth and for people around the world. As challengers and innovators, we create and grow business while addressing material issues for sustainable development. To realize this mission and vision, Mitsui & Co. Group views respect for human rights as a foundational value, as stated in our Group Conduct Guidelines.

This Human Rights Policy (“Policy”) sets out our group-wide approach to human rights throughout our business activities in countries and regions around the world, and Mitsui & Co. Group commits to operate with respect for human rights following this Policy. In addition, we expect various stakeholders including our business partners, to understand and respect human rights in line with this Policy, and aim to collaboratively promote respect for human rights.

Respecting Human Rights in our Business Activities

We strive not to infringe on human rights in our business activities, nor to contribute to human rights infringements by others through our business relationships, including supply chains.

Respecting Internationally Recognized Human Rights Standards

We are committed to respecting human rights understood as, at minimum, those set out in the International Bill of Human Rights and the ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work. We also support the United Nations Guiding Principles on Business and Human Rights and the Ten Principles of the United Nations Global Compact and conduct our business activities in line with these

Principles. We comply with laws and regulations of the countries and regions in which we conduct our business activities. Where internationally recognized human rights standards and national/regional laws and regulations are in conflict, we seek ways to honor the principles of internationally recognized human rights while complying with the laws and regulations.

Governance/management structure

The Board of Directors of Mitsui & Co., Ltd. is responsible for overseeing the adherence to this Policy and the Policy implementation.

Human rights Due Diligence

We commit to implement human rights due diligence to identify, assess, prevent and mitigate adverse human rights impacts associated with our business activities.

Human Rights Issues related to Business Activities

• Forced Labor

We do not tolerate forced labor. In addition, we do not tolerate any forms of modern slavery, including bonded labor or human trafficking.

• Child Labor

We do not tolerate child labor, and we comply with the minimum working age stipulated by the law. We do not hire individuals that are under the age of 18 for roles requiring hazardous work.

• Discrimination

We prohibit any form of discrimination based on race, creed, sex, social status, religion, nationality, age, sexual orientation, gender identity, physical and mental disability or any other grounds. We respect each employees’ individuality and diversity and seek to cultivate an environment in which they can perform to the best of their abilities.

• Harassment and Inhumane Treatment

We do not tolerate any form of harassment, whether physical or mental, including sexual harassment or power harassment. Furthermore, we prohibit any language or behavior that could be harmful to the working environment of others including discriminatory language or behavior as well as harassment.

• Freedom of Association and Right to Collective Bargaining

We respect the rights of employees to associate freely and bargain collectively in our labor-management relations.

• Working Hours and Wages

We monitor employees’ working hours, holidays, leaves of absence and wages to ensure we are operating in accordance with applicable laws and regulations.

• Occupational Health and Safety

In line with applicable laws and regulations, we aim to develop safe, healthy working environments in which every individual employee can work with peace of mind.

• Community Impact

To prevent adverse impacts on the safety and health of local communities, we conduct human rights impact assessments, covering issues such as prevention of pollution and water stress, and implement necessary measures in line with international standards to avoid risks and mitigate negative impacts.

Stakeholder Engagement

We believe it is critical to understand human rights issues from the perspectives of affected stakeholders. We further recognize that certain groups of stakeholders are more vulnerable to adverse human rights impacts and thus require heightened attention. We therefore value the importance of dialogues with relevant parties and strive to properly respond to human rights issues associated with our business activities.

Remedy

Where we identify that our business activities have caused adverse human rights impact or contributed to it through our business transactions including our supply chains, we will work to remediate such impacts through appropriate processes.

Grievance Mechanisms

We continue to build upon our whistleblowing procedures and grievance mechanisms to promptly identify and respond to human rights issues related to our employees or wider business activities.

Education and Training

We will provide necessary training and capacity building to our executives and employees to ensure that they understand this Policy and act in line with the commitments in this Policy.

Reporting

We will continuously report our efforts and progress on respecting human rights through our reports, websites, and other communication channels.

Initiative for Specific Issues

Policy

Children's rights

We support the Children's Rights and Business Principles and strive to conduct business activities with respect to children's rights.

Rights of indigenous peoples

We strive to respect the human rights and cultures of indigenous peoples by complying with all applicable laws and regulations of the countries and regions in which we conduct our business activities as well as by respecting relevant international standards such as the United Nations Declaration on the Rights of Indigenous Peoples, the Convention concerning Indigenous and Tribal Peoples in Independent Countries (ILO Convention: C169), and the principle of "free, prior and informed consent (FPIC).

Activities of security personnel

In advancing business activities around the world, Mitsui hires security companies to ensure the safety of its business activities.

In appointing a security firm, we comply with relevant local laws and regulations in the countries and regions in which we conduct our business activities, and select security companies based on relevant international standards such as the Voluntary Principles on Security and Human Rights, UN Code of Conduct for Law Enforcement Officials, and the Principles on the Use of Force and Firearms by Law Enforcement Officials.

Human Rights Management

System


The Board of Directors of Mitsui & Co., Ltd. is responsible for overseeing the adherence to this Policy, and the Corporate Management Committee makes material decisions regarding the Policy execution. The Sustainability Committee, a subordinate body of the Corporate Management Committee, is in charge of deciding detailed plans and measures for the Policy implementation.

Employees' Human Rights

System

Activity

As a company engaged in business on a global scale, Mitsui is not only working to promote diversity and inclusion, but is also taking various steps to prevent harassment and discrimination. These measures include the establishment of whistleblowing systems that allow employees to report compliance issues, including cases relating to human rights and discrimination, and obtain advice through channels within or outside the employee's direct reporting line. Another example of our efforts in this area is fostering a "speak up" culture in which employees are encouraged to report situations that concern them. We will continue to implement initiatives to ensure respect for the human rights of our employees, including training programs and the dissemination of related policies.

 **P.76** Career Development Initiatives for Our Diverse Human Resources

 **P.106** Integrity and Compliance

Business Risk Management

System

Activity

Mitsui classifies any new business project that involves significant qualitative risks related to the environment, society, and corporate governance as "Specially Designated Business." Such projects are implemented in accordance with the Specially Designated Business Management System. Projects

covered by this system are subject to internal screening in relation to occupational health and safety. In the case of development projects, the screening also encompasses the human rights of local residents and other stakeholders. The Environmental & Societal Advisory Committee meets as required, not only when projects are initiated, but also during operation and the termination stage, to deliberate on potential human rights violations and ESG risks, such as changing environmental risks and occupational health and safety issues.

P.113 Specially Designated Business Management System and Environmental & Societal Advisory Committee

Human Rights Due Diligence

Activity

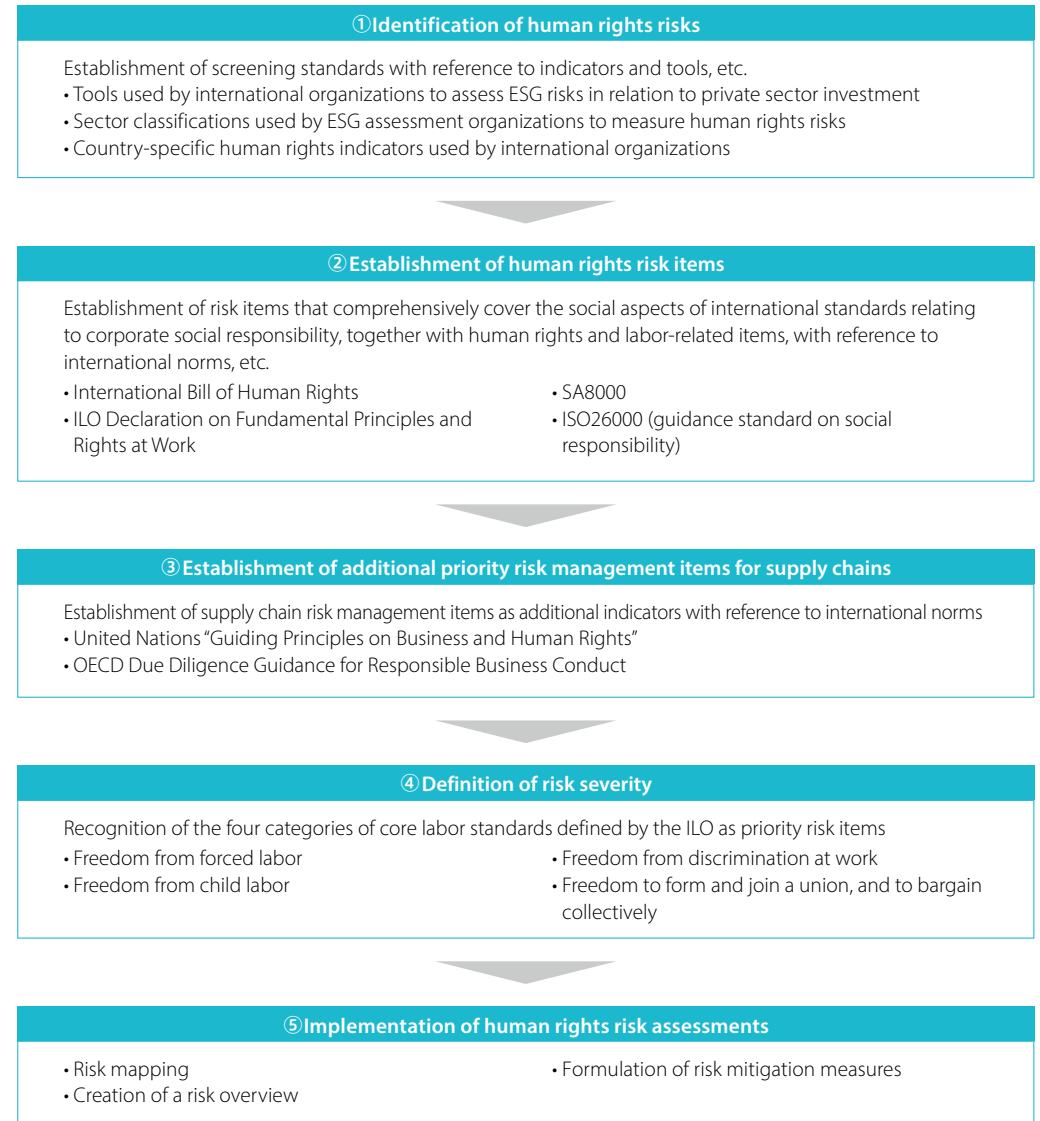
In accordance with the United Nations Guiding Principles on Business and Human Rights, in the fiscal year ended March 2020, Mitsui appointed external experts and began conducting due diligence with regard to human rights in the supply chains of products handled by Mitsui and its overseas trading affiliates, as well as the main business operations of its consolidated subsidiaries.

The first step was to identify business areas with significant human rights risks. We established human rights identification and screening criteria based on international indicators and other tools, and carried out screening processes. The next step was to identify human rights risk items in preparation for the implementation of human rights assessments. These human rights risk items comprehensively encompass the social aspects of international norms and standards relating to corporate social responsibility, as well as items relating to human rights and labor. We also added priority risk management items in supply chains. In particular, items in the four areas identified by the International Labour Organization (ILO) as core labor standards were assessed as priority high-risk items.

As a result of risk assessment, our business operations and supply chains mainly related to food, textiles, building materials and mining industry were identified as presenting high risk business areas with significant human rights risks. We compiled an outline of human rights risks and formulated measures to mitigate these risks. The items of main risk mitigation measures were added to the supply chain survey for the fiscal year ended March 31, 2020, and will be checked through on-site inspections starting in the fiscal year ending March 2021. By the end of the fiscal year ending March 31, 2023, we plan to conduct a survey of all major suppliers of materials and products identified as having high risk based on human rights risk assessments. Mitsui will work with suppliers to ensure an understanding of respect for human rights and promote human rights practices throughout its supply chains.

P.66 Initiatives with Suppliers

Human Rights Risk Assessment Process



Respecting Indigenous Peoples

System

Activity

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 each country or region's 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, the operations of our forest resource business in Australia are guided by respect for the traditional rights of the Aboriginal peoples. We have ensured accountability by obtaining FSC® certification (FSC®-C107463), which requires regular audits by third-party certification bodies. This certification is based on 10 major principles, including respect for the traditional rights of indigenous peoples. There are stringent audits covering such aspects as whether or not Mitsui's management of business operations gives consideration to traditional Aboriginal rights, and whether or not measures are taken to prevent damage to significant cultural sites, etc. In our iron ore mining operation in Brazil, we maintain close communication with the indigenous people living in the Amazon 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.

The UK Modern Slavery Act 2015

Activity

In 2015, the United Kingdom enacted the Modern Slavery Act, which is designed to eliminate slave labor. The act requires profit-making enterprises that conduct business within the U.K., and which have an annual turnover above a certain threshold, to publish an annual statement confirming that measures are taken to eradicate slavery and human trafficking in their business activities and their supply chains.

In compliance with requirements under Section 54 of the Modern Slavery Act, Mitsui and its affiliated companies issue annual statements affirming that we prevent forced labor and other forms of modern slavery and human trafficking.



The UK Modern Slavery Act

Human Rights Training

Activity

As part of our initiatives in relation to human rights in supply chains, we invited Ms. Asako Nagai of Business for Social Responsibility (BSR) to a meeting of Sustainability Promotion Officers in September 2019. Ms. Nagai gave a presentation on "Trends in Business and Human Rights" at the meeting, which was attended by 49 people. Her lecture on related trends provided a valuable opportunity to consider human rights issues in various frontline business situations at a time when companies are required to take action and disclose information about human rights violations, not only in their own operations, but also throughout the value chains that are linked to their activities.

In relation to employees' human rights, we are working to reduce harassment cases by providing mandatory harassment prevention training for all line managers and employees in a managerial position equivalent to the line manager level.

In November 2019, Mitsui & Co. (Australia) Ltd. invited an external attorney to present a compliance seminar on the topics of discrimination and harassment prevention and unconscious bias. The presentation also covered responses to Australia's Modern Slavery Act (2018).



Human rights training (September 2019)