



ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT FOR FISCAL YEAR ENDED 31 MARCH 2021

1. Introduction

Mitsui & Co., Ltd. ("Mitsui") has produced this Anti-Slavery and Human Trafficking Statement for the fiscal year ended 31 March 2021 ("FY Mar/2021"), in response to Section 54 of the UK Modern Slavery Act 2015.

2. Our Organization

Mitsui is a company incorporated under the laws of Japan, having its head office in Tokyo. We operate through 132 offices and overseas trading affiliates located throughout 64 countries and regions globally. As of 31 March 2021, on a consolidated basis, we have 514 affiliated companies for consolidation and approximately 44,500 employees worldwide.

For more information on our organization, please refer to our websites below.

Corporate Profile:

<https://www.mitsui.com/jp/en/company/outline/profile/index.html>

Organizational Structure:

<https://www.mitsui.com/jp/en/company/outline/organization/index.html>

3. Our Business

Mitsui conducts diverse business activities around the globe, delivering solutions, services and products to our partners and customers in the following business areas: Iron & Steel Products, Mineral & Metal Resources, Machinery & Infrastructure, Chemicals, Energy, Lifestyle, and Innovation & Corporate Development.

For more information on Mitsui's business activities, please refer to our website below.

Our Business:

<https://www.mitsui.com/jp/en/company/business/index.html>

4. Our Supply Chains

Mitsui provides a wide range of functions and services, such as marketing, business development, project management, logistics, finance, risk management and digital

transformation. Therefore, we are active at almost all stages of our supply chains, from upstream to downstream.

In the fiscal year ended 31 March 2020, we identified high risk business areas through our human rights risk mapping process, together with advice from and consultation with independent experts. Our business operations and supply chains mainly related to food, textiles, building materials and mining industry were identified as presenting high risk for slavery and human trafficking. Our assessment was based on leading international human rights risk indicators and other tools such as the "[List of Goods Produced by Child Labor or Forced Labor](#)" of Bureau of International Labor Affairs (ILAB) and "[Global Map of Environmental and Social Risks in Agro-Commodity Production](#)" of International Finance Corporation (IFC), placing emphasis on the core labor standards identified by the International Labour Organization (ILO).

5. Our Policies and Guidelines

- "[Human Rights Policy](#)"

Formulated in August 2020, this policy sets out our group-wide approach to human rights. It includes our commitment to operate our business with respect for human rights and our expectations for various stakeholders to understand and respect human rights in the manner specified therein.

- "[Business Conduct Guidelines for Employees and Officers](#)" and "[Mitsui & Co. Group Conduct Guidelines -With Integrity](#)"

Both of these sets of corporate guidelines include requirements for employees to respect human rights and not to engage in discrimination of any kind. It also states that employees shall prevent human rights violations and collaborate with suppliers to ensure that they do not contribute to human rights violations, such as child labor or forced labor.

- "[Sustainable Supply Chain Policy](#)"

Our former Supply Chain Corporate Social Responsibility Policy was updated and renamed as our Sustainable Supply Chain Policy in August 2020 to mainly reflect our Human Rights Policy. This policy sets out our expectations of our suppliers to respect human rights, including not to tolerate forced labor, bonded labor, human trafficking, child labor or any other form of modern slavery.

- "[Procurement Policies for Specific Commodities](#)" (natural rubber, palm oil, timber and paper products)

Formulated in July 2021, these policies set out our group-wide approach to social risks such

as violations of worker's rights and human rights of local communities as well as environmental risks such as deforestation for the procurement of natural rubber, palm oil, timber and paper products. They include our commitment to "no deforestation" and "no exploitation" for the procurement of natural rubber, palm oil, timber and paper products. They also set out our expectations for our suppliers to respect human rights and cultures of indigenous people. In accordance with these procurement policies, we ask our suppliers to comply with all applicable laws and regulations as well as to respect 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 \(FPIC\)](#).

- Respecting Internationally Recognized Human Rights Standards

We are committed to respect human rights as contained, at a minimum, in the International Bill of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We also endorse 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.

For more information on our efforts to respect human rights, please refer to ["Human Rights"](#).

6. Our Approach

- New business investments

New business investment projects are subject to environmental, social, and governance (ESG) impact assessments, using our ESG due diligence checklists that consider environmental and societal risks based on international standards. These assessments cover aspects such as human rights, pollution prevention, climate change, ecosystems and water stress.

- Supply Chain Management

- Supplier Communication Forms

When commencing business with a new supplier, Mitsui, its domestic and overseas offices, its overseas trading affiliates, and its domestic and overseas consolidated subsidiaries send formal written communications requesting such supplier to understand and cooperate to comply with our Sustainable Supply Chain Policy. In

addition, we conduct an internal investigation every other year, to verify that such communications were duly dispatched to all new suppliers.

➤ Supplier Questionnaire Surveys

Mitsui regularly conducts questionnaire surveys on selected major suppliers who handle products in high-risk business domains. As part of our human rights due diligence process, these surveys are conducted to confirm the status of their adherence to our Sustainable Supply Chain Policy. We also assess whether such suppliers maintain their own policies and measures on human rights and environmental aspects. In FY Mar/2021, we conducted questionnaire surveys on 293 suppliers. We will continue to prioritize our questionnaire survey on major suppliers handling high risk products.

➤ Supplier On-Site Surveys

Mitsui conducts face-to-face interviews with suppliers' management and employees, including persons in charge of health, safety and environment (HSE) and on-site inspections of suppliers' facilities together with an external expert, using a checklist for compliance with our Sustainable Supply Chain Policy. We provide advice and guidance to those inspected suppliers when needed. In FY Mar/2021, we surveyed 2 suppliers on site and found no violations of our Sustainable Supply Chain Policy.

➤ Subsidiaries On-site Survey

In FY Mar/2021, Mitsui started to conduct on-site surveys on its subsidiaries in order to confirm their understanding and implementation of our Sustainable Supply Chain Policy. We surveyed 2 subsidiaries on site in FY Mar/2021 and found no violations of our Sustainable Supply Chain Policy.

For more information on our supply chain management, please refer to ["Supply Chain Management"](#)

● Whistleblowing System

We maintain a whistleblowing framework, which has been put in place to encourage staff to report any suspicions they may have, including human rights violations. So that the system functions effectively, we make sure that no retaliation or detrimental treatment occurs against whistleblowers.

For more information on our approach to compliance, please refer to [“Compliance & Integrity”](#)

- Internal Audits

Internal audits, performed on business divisions as well as corporate staff divisions of Mitsui, its domestic and overseas offices, its overseas trading affiliates, and its domestic and overseas affiliated companies, also include assessments of ESG aspects such as respect for human rights.

- Training and Capacity Building

Staff awareness is a key measure in preventing modern slavery and human trafficking. In order to enhance awareness of human rights and labor related issues in our global supply chains, we hold employee awareness-raising seminars and activities regularly. In FY Mar/2021, 392 employees participated in these training seminars held online.

In July 2021, we invited external experts to hold an online seminar for our suppliers as well as our employees involved in the procurement of goods presenting a higher risk of modern slavery or other human rights violations, including natural rubber, palm oil, timber and paper products. The seminar was aimed at enhancing their awareness of human rights issues relating to their business and the importance of realizing sustainable supply chains.

The Board of Directors of Mitsui approved this statement on 15 September 2021.



Shinichiro Omachi
Representative Director,
Executive Vice President
Mitsui & Co., Ltd.