

Mitsui Kinzoku Group Statement on U.K. Modern Slavery Act

We make this Statement pursuant to Section 54 of the United Kingdom (UK) Modern Slavery Act 2015 to identify action we have taken on a Mitsui Kinzoku Group-wide basis during the financial year ending March 31, 2019 to prevent slavery and human trafficking from occurring in our business or our supply chains. Although not all Mitsui Kinzoku Group companies are subject to the Act, we have adopted a Group-wide approach to our human rights commitment, and make this Statement on behalf of Mitsui Kinzoku Group companies (sometimes collectively referred to as “Mitsui Kinzoku”).

Company Overview and Supply Chain

Mitsui Kinzoku is engaged in the manufacturing and sale of functional engineered materials and electronic materials, nonferrous metal smelting, mining, precious metal recycling, raw material related businesses, and the manufacturing and sale of automotive parts/components, etc.

We procure materials and component parts for those products from suppliers located throughout the world.

Mitsui Kinzoku has approximately 80 sites located in Japan, China, Taiwan, South Korea, Thailand, India, Indonesia, Vietnam, Malaysia, Peru, Mexico, the United States, the United Kingdom, and Morocco. As of March 31, 2019, Mitsui Kinzoku had approximately 13,000 employees. Mitsui Kinzoku’s operation in the United Kingdom is represented by Mitsui Components Europe Ltd, a subsidiary incorporated in Wales.

Applicable Corporate Policies

Mitsui Kinzoku prepares and distributes applicable policies to its employees and suppliers to ensure that slavery and human trafficking is not taking place in any part of its business or supply chain.

Mitsui Kinzoku’s applicable policies include:

- Basic CSR Policy (including Code of Conduct)

<https://www.mitsui-kinzoku.co.jp/en/csr/concept/>

- Human Rights Policy

<https://www.mitsui-kinzoku.co.jp/en/csr/humanrights/humanrightspolicy/>

- Procurement Policy

<https://www.mitsui-kinzoku.co.jp/en/csr/supplychain/>

- Conflict Minerals Policy

<https://www.mitsui-kinzoku.co.jp/en/csr/humanrights/conflictmineralresponsepolicy/>

We comply with universal principles regarding human rights and labour practices worldwide. In addition to complying with laws and regulations, our Basic CSR Policy (including the Code of Conduct) and Human Rights Policy stipulate respect for basic human rights and oppose child labour and forced labour.

We request all our suppliers, who play an important role in the Mitsui Kinzoku Group companies' production and services, to understand and put into practice the Mitsui Kinzoku Group Procurement Policy.

We have established the policy of not using conflict minerals (tin, tantalum, tungsten and gold) if these minerals are the source of funds for armed groups who are violating human rights.

Risk Assessment

We have adopted an approach to prevent slavery and human trafficking in our business and supply chain as a series of efforts to respect human rights, including other human rights risks.

At Mitsui Kinzoku we conduct human risk assessment in our business and supply chain. We recognize that there are risks in our business and supply chain as a company engaged in business related to the mineral supply chain, and risks specific to the mining business.

Due Diligence Framework

The CSR Chairperson (the President) is identified as the highest responsible person for the human rights management of Mitsui Kinzoku Group, and the appointed Senior Executive Officer has responsibility for supply chain management.

For our group manufacturing sites, we conduct a survey using Self-Assessment Questionnaires(SAQs), which include slavery and human trafficking. Based on the survey results, we conduct on-site surveys and interviews. The results are fed back to each site, based on which corrective measures will be taken. For sites engaged in mining activities, we conduct a survey which focuses on human rights issues specific to the business area.

We request our suppliers to understand and implement the Procurement Policy. In addition, we request our critical suppliers to submit "Supplier CSR Self-Assessment Sheets" from which we can assess the conditions relating to the issues such as respect for human rights & labour (including slavery, human trafficking, child labour, non-discrimination, harassment, and working environment), health & safety, environment and ethics.

Effectiveness and Performance Review

In FY 2018, we conducted surveys at 10 sites of the Mitsui Kinzoku Group in Japan and two sites in China.

There were no cases of slavery and human trafficking. In FY 2019, we will conduct the survey in at least six sites in Japan and two overseas.

We started our supplier CSR management in FY 2018. We conducted Supplier Assessments as a trial, using Supplier CSR Self-Assessment Sheets, and 76 suppliers have responded. There were no cases of slavery and human trafficking among the suppliers that conducted the assessment. We will sequentially request our critical suppliers to submit CSR Self-Assessment Sheets. By FY 2020, we will conduct the assessment on at least 400 suppliers.

Grievance Mechanism

Mitsui Kinzoku Group receives internal reports and consultations concerning human rights from our stakeholders through the Mitsui Kinzoku Hotline and CSR Inquiry Line.

Training

Mitsui Kinzoku provides our employees with human rights training in order to raise awareness of human rights issues including slavery and human trafficking, informing employees of our human rights policy. In Japan, human rights training, including Code of Conduct is conducted as part of level-specific training, and approximately 250 employees attended in FY 2018. At overseas sites training is implemented sequentially as part of CSR training. In FY 2018, approximately 60 employees participated at two sites in Taiwan.

We also introduced training on our procurement policy for employees in charge of procurement, and approximately 300 employees participated in FY 2018. Suppliers will be made aware of procurement policies at procurement policy briefings, and asked to work on the items specified in the procurement guidelines.



Keiji Nishida

President, Representative Director

June 2019