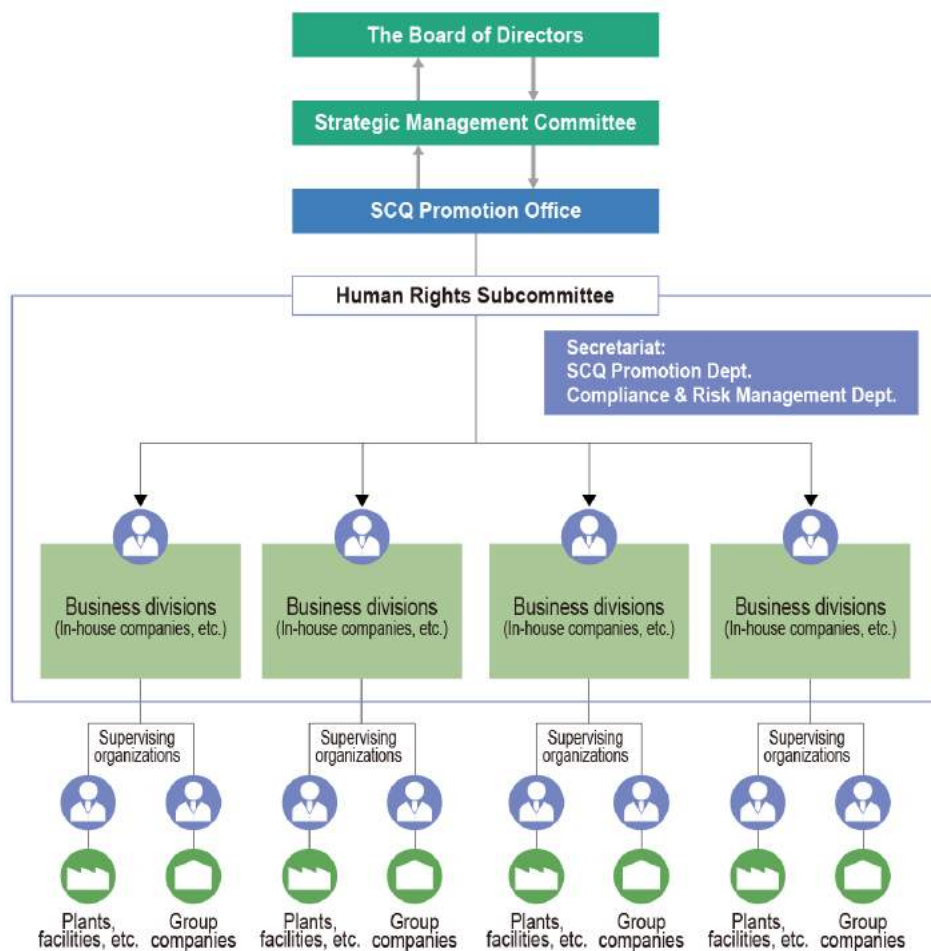


Respect for Human Rights

Respect for Human Rights

1. Human Rights Policy

In developing our businesses globally, we believe that it is essential not only to comply with the laws and regulations of each country, but also to respect international human rights standards. For this reason, the Mitsubishi Materials Group established the Human Rights Subcommittee under the Sustainable Management Office (now known as the SCQ Promotion Office) in July 2021, and that December established a Human Rights Policy in compliance with the UN Guiding Principles on Business and Human Rights. This Policy applies to all officers and employees of the Mitsubishi Materials Group. We also expect the Group's business partners to support and practice this Policy and aim to promote respect for human rights together with them. Moreover, our initiatives to respect human rights are periodically reported to the Executive Officers' Meeting and the Board of Directors via the Sustainable Management Office.



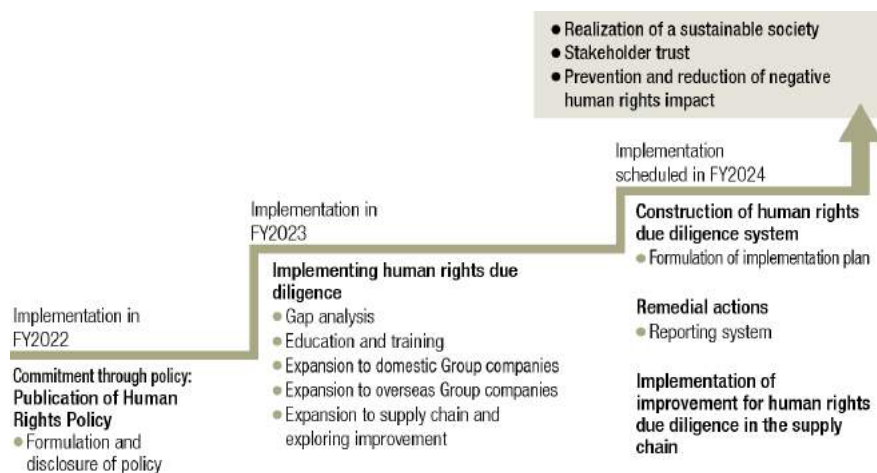
- ▶ We established our Human Rights Policy effective on December 1, 2021.
- ▶ We signed the UN Global Compact and were registered as a participating company as of March 22, 2022.

2. Human Rights Roadmap

To enhance our human rights initiatives, the Mitsubishi Materials Group drives human rights due diligence within Group companies in Japan and overseas as we seek to reduce human rights risks. We also drive collaborative initiatives with our business partners. We have established a PDCA cycle to identify and review assumed risks based on the results of fact-finding surveys on human rights issues, and continually implement it. We will further instill it internally through human rights awareness training and other measures.

Since fiscal 2023, we have been working on the following three items in accordance with the United Nations Guiding Principles on Business and Human Rights in order to mitigate and prevent our business activities from negatively impacting human rights.

- Dissemination of commitment to human rights policy
- Implementing human rights due diligence
- Remedial action (processes that enable remedial action for negative impact on human rights caused or promoted by businesses)



3. Human Rights Initiatives



1. Commitment under the Policy


We have signed the United Nations Global Compact, participate in activities related to our business, gather relevant information and utilize it in the formulation of measures related to human rights.

Additionally, in training conducted in Japan and overseas for fiscal 2023, we dealt with “Business and Human Rights” and Group Human Rights Policy formulated on that basis, with all employees taking part in the training. In compliance training conducted for managers at our overseas sites, we also raised human rights issues. Furthermore, in training for corporate officers, we began to education on human rights in fiscal 2022 and continued this curriculum in fiscal 2023.

2. Implementing Human Rights Due Diligence

(1) Human rights due diligence within the Mitsubishi Materials Group

At the Mitsubishi Materials Group, we perform human rights due diligence to identify, assess, prevent, and mitigate negative impacts on human rights related to our business activities. We also incorporate feedback from outside experts to identify and consider issues including human rights issues throughout the value chain. In fiscal 2023 we conducted a risk screening of our Group companies and distributed a self-check list (SAQ) to roughly thirty percent of Group companies deemed high-risk. We have started to build mechanisms for human rights due diligence in the Group by analyzing the SAQ responses. Going forward, we will strive to mitigate risks in high-risk regions and plan to develop a human rights due diligence system that covers the entire Group.

	Human rights risk assessment
	Overall design of human rights risk management procedures
	Developing a roadmap for human rights due diligence

(2) Human rights due diligence in the supply chain

See Responsibility throughout the Value Chain - [Responsible Procurement of Raw Materials](#) in the Sustainability Report

3. Remedial Measures

For employees of the Group, we have established reporting and consultation offices in Japan, and also field consultations regarding human rights. Our reporting and consultation offices began to comply with the revised Whistleblower Protection Act in June 2022, developing systems to strictly guarantee confidentiality and implement remedial measures. We also raise awareness through training and other measures in an effort to improve the effectiveness of these systems.

For inquiries from outside the Group, we currently have a contact for inquiry at our corporate website, but we are considering enhancing and expanding contact points for accepting inquiries.