

# Mitsubishi Electric Group Human Rights Policy

Protection of human rights and support for internationally agreed human rights are imperatives for the Mitsubishi Electric Group's business activities. Accordingly, as members of the Group, we recognize our duty to prevent any complicity with human rights violations.

As the Mitsubishi Electric Group continues to expand its business globally, it has established this Human Rights Policy in accordance with the spirit of the Mitsubishi Electric Group's "[Purpose](#)" and "[Our Values](#)". By conducting our activities in accordance with this Policy, we respect the human rights of everyone involved in our business activities and contribute to the creation of a society where all people are respected.

## **Scope of human rights to be protected**

This Policy covers the human rights of all stakeholders in the Mitsubishi Electric Group's business activities, including employees (including temporary, part-time, contract and other non-regular employees), employees of business partners, customers, consumers, and local communities.

## **Scope of this Policy**

The Mitsubishi Electric Group applies this policy to respect human rights to all executives and employees of the Mitsubishi Electric Group. Moreover, we further contribute to the creation of a society where human rights are respected through seeking cooperation from various stakeholders related to our businesses, products, and services throughout the value chain.

Expectations for respecting human rights are stipulated in the Mitsubishi Electric Group Code of Conduct for employees and in the Mitsubishi Electric Group Supply Chain Code of Conduct for business partners.

## **Compliance with international standards and laws related to human rights**

The Mitsubishi Electric Group recognizes that, as a minimum, it must respect international standards related to human rights<sup>\*1</sup>, such as the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. On

that basis, we shall respect human rights while making sure to adequately understand relevant laws and regulations in every country and region in which we operate.

If such laws and regulations do not conform to international standards related to human rights, the Mitsubishi Electric Group will take efforts to respond in accordance with the United Nations Guiding Principles while respecting local laws.

\*1: Major international norms and guidelines referenced by the Group are listed in the Appendix.

### **Management Structure for Respecting Human Rights**

The Mitsubishi Electric Group has established a structure<sup>\*2</sup> to address respect for human rights as a key management issue, and discusses and decides on policies to guide various tasks. This includes formulation, revision, or abolition of human rights-related policies, confirmation of the results of human rights impact assessments and progress in risk mitigation measures for priority issues, and improvement of grievance mechanisms. The status of these activities are reported regularly to the Executive Officers and the Board of Directors for guidance and supervision.

\*2: The Group's management structure regarding respect for human rights is described in the Appendix.

### **Respect for Human Rights**

The Mitsubishi Electric Group respects the human rights of all persons involved in its business activities.

[Prohibition of child labor and forced labor]

We respect human rights in all aspects of our business activities and do not allow child labor or forced labor.

[Non-discrimination]

We do not tolerate any form of discrimination based on race, ethnicity, nationality, gender, age, creed, religion, social status, gender identity/sexual orientation, disability, or other attributes.

[Prohibition of harassment /Humane treatment ]

We do not engage in any conduct that undermines the dignity of others, such as harassment, slander, libel, or coercion of work through intimidation. We will check our daily communications and actions to prevent them from being misunderstood or suspected as such.

[Fair treatment]

We provide individuals with fair opportunities to obtain education, experience, skills, and abilities appropriate to each role in business.

We treat individuals fairly based on their experience, skills, abilities, performance, and growth potential.

[Working Hours]

We manage working hours and holidays appropriately based on internationally recognized standards and in accordance with the laws and regulations of the countries and regions in which we operate.

[Respect for diversity of individuals]

We respect the diverse nature of all people. We embrace the individuality of each person and provide a work environment where diverse people can work with high motivation and enthusiasm.

[Freedom of association and collective bargaining]

We respect fundamental labor rights. We respect freedom of association and that labor unions hold the three primary rights of labor (right to organize, right to collective bargaining, and right to act collectively). We strive to maintain and improve healthy working conditions and workplace environments, following the basic principle of seeking resolution of issues through rational discussions on an equal footing between labor and management.

[Health and Safety]

We comply with all laws and regulations related to health and safety, and ensure that all employees, including those of contractors and subcontractors, can maintain their physical and mental health and work in a sound condition.

[Respect for privacy]

We protect the personal information of every person involved in the business activities of the Group, including business partners, customers, consumers, and employees. We only collect personal information in a fair, transparent, and safe manner in accordance with laws and social norms, and use, retain, and disclose personal information strictly within the scope of its purpose of use. We take security measures to prevent unauthorized accessing, theft, loss, and falsification of personal information.

### **Consideration to vulnerable groups**

The Mitsubishi Electric Group pays particular attention in its business activities to individual members of groups or ethnicities that may be at higher risk of human rights impacts, such as children, migrant workers, and ethnic minorities.

### **Human rights due diligence**

The Mitsubishi Electric Group conducts human rights due diligence in accordance with the United Nations Guiding Principles on Business and

Human Rights, and continuously works to identify, prevent, mitigate, and remedy negative human rights impacts that its business activities may have directly or indirectly through its value chain.

- ① The Mitsubishi Electric Group conducts human rights impact assessments across its value chain with internal and external expertise to identify and assess salient human rights issues that the Group should address. \*<sup>3</sup>
- ② We take measures against identified human rights issues, and promptly take corrective action if our business activities are found to have caused or been involved in negative human rights impacts. In both prevention and remediation, we will cooperate with business partners and other stakeholders as necessary.
- ③ The Mitsubishi Electric Group regularly monitors the situation to determine whether its activities to prevent and correct negative human rights impacts are effective.
- ④ The Mitsubishi Electric Group discloses its human rights practices, including human rights due diligence, on a regular basis.

\*3: Human rights issues that the Group considers high priority are listed in the Appendix.

## **Remedy**

The Mitsubishi Electric Group accepts inquiries from all stakeholders (employees, business partners, customers, consumers, local residents, etc.) all days of the year through its [Human Rights Contact Desk](#). Relevant departments will promptly investigate the facts pertaining to the contents of each complaint. If the investigation finds any act of human rights violation in the value chain of the Group, we will take appropriate actions including swiftly correcting and improving the situation, providing remedy to the victim, and disciplining the offending party in accordance with the UNGP.

While information received at the Contact Desk will be shared with relevant departments to resolve the problem, the scope of sharing will be kept to what is strictly necessary. Retaliation against anyone for making a report is prohibited.

## **Education and communication**

The Mitsubishi Electric Group continuously provides education and awareness-raising activities to ensure that each individual officer and employee understands and takes appropriate actions to promote respect for human rights.

This Policy and related initiatives are communicated both internally and externally and made accessible to all stakeholders (including employees, business partners, customers, consumers, and local communities).

## **Stakeholder engagement**

The Mitsubishi Electric Group ensures the effectiveness of its human rights initiatives through dialogue with negatively affected groups, experts, NGOs, and other civil society organizations.

## **Revision and enhancement of policies**

The Mitsubishi Electric Group will continuously review and improve this Policy based on societal changes, insights from external experts, and dialogue and consultation with stakeholders.

Individual policies<sup>\*4</sup> will be developed as necessary for concrete and effective action on specific issues.

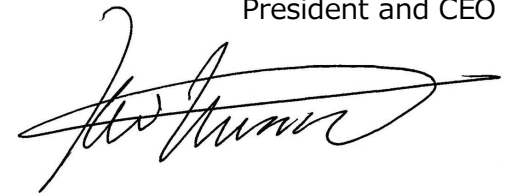
\*4: The Group's individual policies are described in the Appendix.

Establishment date: September 20, 2017

Revision date: August 20, 2024

Mitsubishi Electric Corporation

President and CEO



**[Appendix]**

\*1 : Major international norms, guidelines, etc.

The Mitsubishi Electric Group recognizes the following major international standards on human rights to be upheld.

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| <ul style="list-style-type: none"><li>• International Bill of Human Rights</li><li>• OECD Guidelines for Multinational Enterprises</li><li>• OECD Due Diligence Guidance for Responsible Business Conduct</li><li>• UN Guiding Principles on Business and Human Rights</li><li>• UN Guiding Principles Reporting Framework</li></ul> | <ul style="list-style-type: none"><li>• ILO Declaration on Fundamental Principles and Rights at Work</li><li>• United Nations Global Compact</li><li>• ISO 26000 (Guide to Social Responsibility)</li><li>• GRI Standards</li><li>• RBA (Responsible Business Alliance) Code of Conduct</li></ul> |
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\*2 : Management structure regarding respect for human rights

The Group's management structure for respecting human rights is shown in the diagram below.



**[Appendix]**

**\*3 : Human rights issues related to business activities**

Based on labor-related incidents that occurred in the past and results of a human rights impact assessment conducted by a third-party expert organization as part of the Group’s human rights due diligence in FY2023, the Mitsubishi Electric Group has identified the most salient human rights issues that can potentially impact different rightsholders (employees, business partners, consumers, customers, and surrounding communities) in the Group's value chain, as shown in the chart below.

Category Priority	Employee	Supply Chain	Product & Service	Common Issue
The most salient human rights issues	Working Environment	Suppliers & Labor Standards	Privacy & Information Security	
	Occupational Safety & Health	Forced, Slave & Debt Labor		
Other human rights issues		Child Labor		
	Non-discrimination & Equal Opportunities	Conflict Minerals	Right to Life & Security	Fraud, Bribery, Corruption
	Collective bargaining & Freedom of Association		Product Quality & Safety	Environmental Impacts
	Forced, Slave & Debt Labor		Ethical Use of Technology	Diversity, Equity & Inclusion (DE&I)
	Young Worker		Responsible Marketing & Sales	Risks in Conflict-affected & High-risk Countries
		Land Rights	Grievance Mechanisms & Access to Remedies	

**\*4 : Related policies**

The Mitsubishi Electric Group has established the following policies in order to take concrete and impactful measures to address specific issues and to ensure that activities to respect human rights are effective.

- Mitsubishi Electric Group Code of Conduct (covering fair procurement, fair advertising and promotion, respect for employees' human rights, product safety and quality, import/export control, prohibition of bribery, fair competition, blocking relationships with anti-social organizations, protection of intellectual property, and environmental conservation)
- AI Ethics Policy
- Privacy Policy
- DE&I Statement
- Mitsubishi Electric Group Supply Chain Code of Conduct