

Support and Responses to Political Activities

The Mitsubishi Electric Group provides support for political activities only upon full consideration of its social standing as defined in its Purpose and in compliance with relevant laws and regulations in each country.

For example, when Mitsubishi Electric makes a political donation in Japan, the Human Resources and General Affairs Division screens all cases in detail in accordance with the Political Funds Control Act, and ensures adherence to all internal procedures. Additionally, in public elections, we make every effort neither to infringe on the Public Offices Election Act nor deviate from sound social morals.

Security Export Control

To help maintain international peace and security, Mitsubishi Electric Group has established and abides by the Corporate Security Export Control Regulation. Based on the regulation, all transactions are closely checked for any inclusion of export controlled items and security concerns related to destination, customers, end-use, and transaction conditions, and are strictly managed pursuant to relevant laws and regulations. Furthermore, to ensure all associated companies in Japan and overseas also take proper action in line with our policies, we distribute the Security Export Control Standard Regulations of the Mitsubishi Electric Group (in Japanese, English, Chinese, and Thai) to all associated companies, and provide guidance for the establishment of regulations, the development of a framework, employee training and internal audits in each company.

In fiscal 2024, in Japan we provided e-learning courses and held online workshops for working-level personnel. For overseas associated companies, we also have e-learning materials for the implementation of training programs in each company in major languages in Europe, America and Asia.

[Compliance e-Learning Programs](#)

Disassociation with Anti-social Groups

The Mitsubishi Electric Group clearly sets forth the following three provisions in the Mitsubishi Electric Group Code of Conduct and implements them.

1. We will not have any relationship with nor will we conduct business with any anti-social forces (including crime syndicates, terrorists and drug dealers). If any demand is made by anti-social forces, we refuse such demand.
2. We comply with applicable anti-money laundering, anti-corruption and anti-social forces laws and regulations.

Furthermore, in Japan, it is recommended to include an article on the “elimination of crime syndicates and other anti-social groups” in transaction contracts and an officer for preventing unreasonable demands, as stipulated in the Act on Prevention of Unjust Acts by Organized Crime Group Members, is assigned to each business office and associated company as a Group-wide measure against unreasonable demands from anti-social groups. If a transaction partner is found to be an anti-social group, we make every effort to promptly disassociate ourselves from the company with the cooperation of the police, external specialist institutions* and lawyers.

* National Center for the Elimination of Boryokudan and the Special Violence Prevention Measures Association (Tokubouren) under the control of the Metropolitan Police Department, National Center for the Elimination of Criminal Organizations, etc.

Compliance Audits and Internal Notification System

Compliance Audits

To verify the state of compliance in the Mitsubishi Electric Group, self-inspections are carried out in each internal department and associated company several times a year. The inspection utilizes various tools, including specific check sheets for the areas of corporate ethics and legal compliance. Corrective action is taken as necessary in response to the result of such self-inspection.

Additionally, internal regulations and systems are in place to ensure proper operations across the Mitsubishi Electric Group. The Corporate Auditing Division of Mitsubishi Electric conducts internal audits to check the operational effectiveness of these regulations and systems (in the audit areas of ethics and legal compliance, accounting and finance, human resources, technology management and quality management). If an audit reveals the need for improvement, the relevant company or department will receive instructions for remediation/improvement. Periodical reports of audit are presented before the audit committee and the President & CEO through the executive officer in charge of internal audits.

Internal Notification System

Mitsubishi Electric has put in place “ethics and legal compliance hotlines” (internal notification system, so-called “whistle blowing system”), with the objective of promptly addressing fraudulent, illegal, and anti-ethical conducts as a self-disciplinary mechanism. This function is available through two notification channels, inside and outside the company. The outside channel is managed by independent law firms. The hotlines are operated pursuant to clearly defined internal regulations that ensure responses to anonymous informants, elimination of disadvantageous treatment of informants, and the confidentiality of all informants. Notifications are also accepted from business partners and companies, if it pertains to issues that arise out of their relationship with Mitsubishi Electric, including but not limited to business transactions.

Alleged issues of each notification are examined by an “ad hoc” investigation group, whose membership is determined depending on the nature of the notification. In case an alleged issue casts doubt on compliance with pertinent laws and/or internal rules, efforts are made to reinforce the prevalence of adequate norms through a revision of rules or explanatory meetings for promoting due understanding of the same. Where misconduct contrary to any laws and/or internal rules is detected, the concerned employee is subject to disciplinary action, and if any organized involvement in the detected incident is found, remediation is demanded of the concerned department.

The detailed functions of these “ethics and legal compliance hotlines” are provided in the Mitsubishi Electric Group Code of Conduct Handbook disseminated to all employees. These detailed functions also appear on posters displayed in each workplace (each department and operating base), on the handheld cards containing the contact information of internal and external contact points that are distributed to all employees, and on the Group intranet, to ensure that we communicate them to all employees.

The internal notification system is also in place at each associated company of the Mitsubishi Electric Group both in Japan and overseas.