

Human Rights

Concept of Respect for Human Rights

Policy on Respect for Human Rights

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.

The Mitsubishi Electric Group has established its Human Rights Policy in accordance with the spirit of the Group's "Purpose" and "Our Values." By conducting its activities in accordance with this Policy, the Group will respect the human rights of all people involved in its business activities and contribute to the realization of a society in which there is respect for all people.

Based on its "Human Rights Policy," the Mitsubishi Electric Group identifies "respect for all people" as materiality and promotes the following initiatives.

[Mitsubishi Electric Group Human Rights Policy](#)

Other Policies Related to Human Rights

The Mitsubishi Electric Group has established the following policies in order to implement more specific and effective measures on individual issues. The Group will work to make its human rights initiatives more effective while promoting specific action on individual issues.

[Mitsubishi Electric Group Code of Conduct](#)

(includes fair procurement, fair advertising, respect for human rights of employees, product safety and quality, import and export controls, bribery prohibition, fair competition, anti-social forces resistance, protection of intellectual property, environmental conservation, etc.)

[AI Ethics Policy](#)

[Privacy Policy](#)

[Diversity, Equity & Inclusion Statements \(in Japanese\)](#)

[Mitsubishi Electric Group Supply Chain Code of Conduct](#)

Management System Related to Respecting Human Rights

In order to undertake human rights due diligence and other measures based on the United Nations Guiding Principles on Business and Human Rights, etc., the Mitsubishi Electric Group has been implementing the Plan-Do-Check-Act (PDCA) cycle. As a part of this effort, the Sustainability Committee and its subordinate organization, the Human Rights Subcommittee (standing), confirm the results of human rights initiatives and review and approve policies and plans. Since human rights issues relate to a wide range of fields, the responsible division is identified first to work on specific issues, while the Human Rights Subcommittee discusses and decides which direction to take with respect to issues of concern to the entire company. A system is in place for reporting progress to the Sustainability Committee and the Executive Officers' Meeting, and to have the executive officers and directors provide oversight.

The Human Rights Subcommittee is chaired by the Senior General Manager of the Sustainability Planning Division and consists of the heads of the relevant divisions.

In addition, the Human Rights Working Group, which is composed of Section Manager-level members from the divisions that make up the Human Rights Subcommittee, examines the practical implementation of various human rights-related initiatives.

In fiscal 2024, the Human Rights Subcommittee met three times, while the Human Rights Working Group met eleven times.

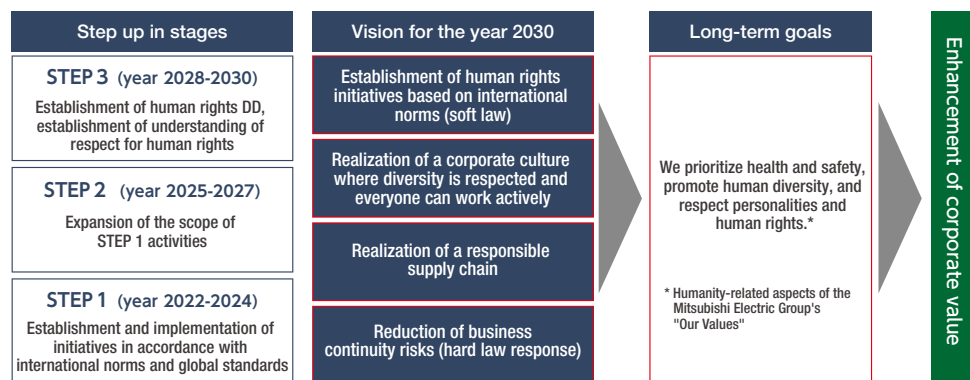


Human Rights Management

Mid- to Long-Term Goals and Roadmap for Human Rights Initiatives

The Human Rights Subcommittee formulated mid-to long-term goals and the roadmap for respecting human rights since human rights initiatives are diverse and must be prioritized, and improvements must be ongoing rather than one-off activities.

In the short term (one year), specific action items and KPIs are set, and the Human Rights Subcommittee and the Sustainability Committee follow up on the results.



Mid- to long-term goals and the roadmap for human rights initiatives (in brief)

Human Rights Due Diligence

The Mitsubishi Electric Group is committed to human rights due diligence (human rights DD) in accordance with the United Nations Guiding Principles on Business and Human Rights.

The Group periodically carries out "Human Rights Impact Assessments" in order to assess the impact of the Group's business activities on human rights and also strives to enhance the management of identified risks.



Identifying and Assessing Negative Impacts on Human Rights (Human Rights Impact Assessment)

Since fiscal 2024, the Group has worked with Business for Social Responsibility (BSR), a United States-based organization that promotes sustainability, to implement a more objective human rights impact assessment based on global standards. The impact assessment involved desktop research followed by identification of potential risks in the Mitsubishi Electric Group's value chain through interviews with each corporate department and prioritization of human rights issues from the perspectives of importance, likelihood of occurrence, and relevance to business. As a result, the Group identified the priority human rights issues among potential issues that could impact its stakeholders, as shown in the figure below.

Human rights issues that may be affected by the Mitsubishi Electric Group's Business Activities

Category	Employee	Supply Chain	Product & Service	Common Issue
Priority				
The most salient human rights issues	Working Environment	Suppliers & Labor Standards	Privacy & Information Security	
	Occupational Safety & Health	Forced, Slave & Debt Labor		
		Child Labor		
Other human rights issues	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

Correcting, Preventing, and Mitigating Negative Impacts on Human Rights

BSR provided recommendations on the human rights issues identified in the previous section to prevent them from occurring. The Mitsubishi Electric Group has formulated improvement measures to address these recommendations and will commence initiatives in fiscal 2025. The Group will strive to strengthen human rights measures at its sites and in its supply chain in accordance with Responsible Business Alliance (RBA)* processes.

* Responsible Business Alliance (RBA): An alliance of companies promoting social responsibility in global supply chains

Future initiatives to address significant human rights issues

Category	Significant human rights issues	Overview of future initiatives
Employees	Workplace environment	<ul style="list-style-type: none"> Strengthen management of associated companies in and outside of Japan, including review of management systems, by collecting information on associated companies to reduce risks such as long working hours and harassment across Group companies
	Occupational safety & health	<ul style="list-style-type: none"> Collect information on safety and health at associated companies overseas, promote risk reduction measures, and disclose information Expand safety and health training through onsite safety and health organizations, including contractors
Supply chain	Supplier and labor standards	<ul style="list-style-type: none"> Utilize the RBA Code of Conduct as the Mitsubishi Electric Group Supply Chain Code of Conduct and apply it to all suppliers Examine the establishment of guidelines for responding to high-risk suppliers
	Forced, slave, and indentured labor Child labor	<ul style="list-style-type: none"> Consider the inclusion of hearings on foreign technical intern trainees in supplier surveys <p>Supply Chain Management (Procurement)</p>
Products and services	Privacy and information security	<ul style="list-style-type: none"> Consider confirmation of response to requests for disclosure of personal information from law enforcement agencies in high-risk countries through information security self-inspection

Tracking and Evaluating Human Rights Initiatives

The Human Rights Subcommittee periodically verifies the status of activities to address the BSR recommendations. In particular, the risk status of the working environment at Mitsubishi Electric Group manufacturing bases and suppliers is verified using the RBA Self-Assessment Questionnaire (SAQ).

Information Disclosure

The results of the activities outlined above are appropriately disclosed in the Integrated Report of the subsequent fiscal year.

Activities to Date (Human Rights Due Diligence Based on Self-Assessment)

In fiscal 2022, a human rights impact assessment was conducted at a total of 417 sites among Mitsubishi Electric and associated companies in and outside of Japan. The assessment identified human rights issues for which the Mitsubishi Electric Group should strengthen its efforts and evaluated the status of efforts at each site.

Corrective measures have been implemented at each site to address the human rights issues identified, and the 329 items picked out as having insufficient efforts were reduced to 39 in fiscal 2024.

Main Corrective Measures

- Utilization of educational materials on anti-harassment and diversity measures implemented within Mitsubishi Electric to provide training at associated companies as well
- Request for suppliers of associated companies to give consideration to human rights by utilizing the CSR Procurement Guidelines used by Mitsubishi Electric

Improvement activities based on the self-assessment outlined above will be completed by the end of fiscal 2025.

Initiatives Related to Employee Human Rights

Basic Policy

Mitsubishi Electric Group is committed to respecting the basic rights of employees, an approach that is included in the principles of the Universal Declaration of Human Rights as well as the United Nations Global Compact, as provided in Mitsubishi Electric Group Code of Conduct.

In addition, Mitsubishi Electric respects the freedom of association as a company and assures Mitsubishi Electric labor union to hold the three basic rights of labor (the right to organize, the right to collective bargaining, and the right to act collectively), under the labor agreement entered into between Mitsubishi Electric and Mitsubishi Electric labor union.

Relationship with Labor Union

Based on the labor agreement, Mitsubishi Electric implements the following.

- The Company and labor union periodically hold meetings of a management council and labor council and have active communication.
- Under the union-shop system, all employees (excluding management-level employees) become union members after completing a trial period, as a rule.
- Working conditions for employees not covered by this labor agreement are determined based on individual employment status and laws related to equal pay for equal work.
- Associated companies in and outside of Japan also share the principle of holding thorough rational discussions between labor and management, and endeavor to maintain and improve sound working conditions and workplace environments in compliance with labor-related laws and regulations concerning employment, personnel affairs, work duties, wages, working hours, immigration control, and so on in the countries and regions where they do business, as well as with internal regulations and procedures.
- The labor contract stipulates that Mitsubishi Electric will swiftly notify the labor union of secondments and transfers of employees within and outside the organization for business reasons. The contract also states that, particularly when large numbers of employees will be seconded or transferred within or outside the organization, the Company will consult with the labor union regarding the basic terms.

[Human Capital Strategy](#)

Human Rights Initiatives in the Supply Chain; Joining the RBA

Since fiscal 2019, we have been seeking consent from suppliers to agreement on initiatives for social issues including human rights issues.

[Supply Chain Management \(Procurement\)](#)

In 2024, the objectivity and transparency of the Mitsubishi Electric Group's human rights initiatives in sustainability procurement was enhanced through the alignment of our own operations with the provisions of the RBA Code of Conduct, the global standard. We will continue to promote ongoing improvement of our sustainability procurement efforts.



Compliance with Laws and Regulations on Human Rights

Relevant divisions within the Mitsubishi Electric Group are collaborating to respond in a timely and appropriate manner to legislation being developed in various countries regarding the implementation of human rights due diligence by companies.

Our statements on the UK Modern Slavery Act, the Australian Modern Slavery Act, Norway's Transparency Act, and Canada's Modern Slavery Act are posted on our official website.

[Compliance with Laws and Regulations on Human Rights](#)

Human Rights Education

The Mitsubishi Electric Group takes various opportunities to educate its employees on human rights.

Training	Content
Job-level specific training	For new employees and newly appointed managers, we provide ongoing training programs regarding human rights. In the training for managers, after completing the course, participants confirm from a manager's perspective whether any problems have occurred in their own workplaces, thereby facilitating the realization of workplace environments in which employees can work comfortably.
Company-wide training (e-learning)	In the "Mitsubishi Electric Group Sustainability" e-learning course for all employees of Mitsubishi Electric and its associated companies in Japan, we provide education on global trends in human rights, the reasons why human rights must be respected, and the Mitsubishi Electric Group's human rights policy, etc., to provide employees with opportunities to deepen their understandings of the importance of corporate efforts to respect human rights.
Harassment training	The Mitsubishi Electric Group conducts harassment training to prevent harassment by promoting proper understanding of harassing behavior and practicing appropriate communication skills. The training includes not only providing information on power harassment and sexual harassment, including harassment against people of the same sex and LGBTQ people, maternity harassment, SOGI harassment, and so on but also introducing specific case studies of harassment. Lectures also provide information on internal and external points of contact for consultation so that employees can report or communicate any issues that they have become aware of. All employees of Mitsubishi Electric and its associated companies in Japan have completed the e-learning program on harassment prevention implemented in accordance with the Mitsubishi Electric Workplace Culture Reform Program.
Human Rights Week	To raise awareness of human rights within the company, the Company delivers messages explaining social trends in the area of business and human rights and the objectives of Mitsubishi Electric's initiatives to employees of Mitsubishi Electric and associated companies in and outside of Japan during Human Rights Week (December 4–10).

[Human Rights and Harassment Prevention Education](#)

Grievance Handling Mechanism

Primary Contact Point for Human Rights Grievances

The Mitsubishi Electric Group has set up multiple contact points, including JaCER,* an external option, to handle human rights inquiries 365 days a year. These channels are available to all stakeholders, such as employees, business partners, customers, consumers, and local residents. Anonymous reporting is also available.

* The Japan Center for Engagement and Remedy on Business and Human Rights (JaCER) provides a nonjudicial platform for addressing grievances in accordance with the UN Guiding Principles on Business and Human Rights.

[JaCER](#)



Responding to Human Rights Grievances

In response to individual reports on human rights risks, the responsible division shall promptly confirm the facts of the case in accordance with the consultation content. In the event that a human rights violation or other problem is identified to have resulted from the Mitsubishi Electric Group's business activities, we shall promptly implement corrective and remedial measures as well as take appropriate actions, including responding to victims and considering disciplinary measures for those who committed such violations, etc. The Mitsubishi Electric Group's main point of contact shall share the details of each consultation with the division in charge of resolving the problem. Nevertheless, efforts shall be made to minimize information sharing among the parties concerned.

No whistleblower shall be retaliated against by any company or individual for making a report.

[Human Rights Contact Desk](#)

Discussion with External Parties

In order to make the Mitsubishi Electric Group's efforts for human rights issues effective, we have discussions with experts, human rights NGOs and other parties to receive advice on human rights initiatives.

In June 2024, as part of the "Business and Human Rights Academy:* Human Rights Due Diligence Training for Japanese Companies" organized by the United Nations Development Programme (UNDP), we had the opportunity to receive some broad feedback from Ms. Alice Cope (Partner, Pillar Two) and Mr. Hideaki Umetsu (Partner, Mori Hamada & Matsumoto) on the Mitsubishi Electric Group's human rights initiatives based on explanations provided by the Group.

Based on the previous Academy session with the two experts, prior to holding this session, we asked them both to review the draft revision of the Mitsubishi Electric Group Human Rights Policy and we endeavored to reflect their comments and recommended improvements in the final version.

During the session, a variety of themes were discussed, such as capacity building for suppliers and ways to enhance access to grievance handling mechanisms for major stakeholders, including suppliers and their workers. The discussions also included how to raise awareness among the various departments within the Mitsubishi Electric Group of respect for human rights and the human rights risks related to their respective activities and business relationships.

These topics will be reflected in our future efforts to respect human rights in the Mitsubishi Electric Group for continuous improvement following discussion by the Human Rights Subcommittee.

* The "Business and Human Rights Academy" organized by the UNDP is a program designed to provide guidance and advice to companies in implementing the UN Guiding Principles on Business and Human Rights and human rights due diligence in particular. The Academy provides training, guidance, and sessions for approximately 1,300 companies throughout the year.



Session with Ms. Alice Cope and Mr. Hideaki Umetsu