

Mitsubishi Chemical Corporation and its Group Companies

Responsible Mineral Procurement Policy

We define KAITEKI as “the sustainable well-being of people, society and our planet Earth”, and has “realizing KAITEKI” as its vision. Through our corporate activities, we aim not only to solve environmental and social issues, but also to contribute to the sustainable development of society and the earth.^{※1}

In conflict-affected and high-risk areas of the world, profits from mineral mining and trade are used to finance armed groups and rebel groups. The use of minerals from such areas may contribute to conflict, human rights abuses, and environmental destruction.

We recognize that these minerals are an important social issue and have developed this policy based on the principle that we will not procure minerals that are known to be involved in conflict or human rights abuses in conflict-affected and high-risk areas. Based on this policy, we will promote sustainable and responsible mineral sourcing throughout our supply chain, while also referring to the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas".

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Mitsubishi Chemical Group
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1. Establishing Company Management Systems

- We will establish a reporting and management system for mineral procurement and take the following actions.

2. Implementation and Response to mineral surveys

- We implement various types of mineral surveys^{*2}, as requested by customers.
- If conflict minerals (tin, tantalum, tungsten and gold)^{*3} are contained in or required for the manufacture of our products, we request our suppliers to take measures to reduce risk by using raw materials and materials made by CFS Conflict Free Smelter^{*4} certified smelters.
- Each Procurement Division will share this issue with suppliers through the CSR Procurement Guidelines and CSR questionnaire^{※5} and monitor the status of the efforts.

3. Addressing the procurement of cobalt, natural mica, and other minerals from high-risk areas (CAHRAs^{*6})

- If minerals such as cobalt and natural mica are sourced from high risk areas (CAHRAs), there are risks described in OECD Guidance Annex II (e.g. human rights abuses including child labor, money laundering). We regularly check legal and regulatory information regarding the minerals and producing regions of interest and review the scope of our mineral surveys.

Footnotes:

※1 The Mitsubishi Chemical Group Charter of Corporate Behavior

<https://www.mitsubishichem-hd.co.jp/english/group/charter.html>

※2 Mineral surveys

Surveys using CMRT, EMRT, etc. issued by RMI (Responsible Minerals Initiative)

※3 Conflict minerals

Conflict minerals are Tin, tantalum, tungsten and gold defined under Dodd-Frank Wall Street Reform and Consumer Protection Act.

※4 Conflict-Free Smelter Certification

Smelters certified under the Responsible Minerals Assurance Process (RMAP) of the Responsible Minerals Initiative (RMI)

※5 CSR Procurement Guideline

https://www.m-chemical.co.jp/company/procurement/pdf/csr_guideline.pdf

※6 CAHRAs

Abbreviation for Conflict-Affected and High-Risk Areas

History:

Enacted on 1-Dec 2022

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