



## Basic Policy

The Mitsubishi Chemical Holdings Group identifies its stakeholders as its customers, shareholders, investors, communities, employees, business partners and everyone else who supports its corporate activities, as well as society at large and the foundation upon which it is built, the Earth. Based on this understanding, Mitsubishi Chemical (MCC) works to earn the trust of its stakeholders by valuing and respecting them, engaging in dialogue and proper disclosure, and reflecting the fruits of such efforts in all its corporate activities.

## Human Rights Policy

MCC has established the Mitsubishi Chemical Group Human Rights Policy as its topmost policy on human rights. Based on an approach to human rights due diligence compliant with the United Nations Guiding Principles on Business and Human Rights, we advance initiatives to identify, prevent, mitigate and account for negative human rights impacts arising from business activities.

### Mitsubishi Chemical Group Human Rights Policy

Mitsubishi Chemical aims to contribute to the sustainable development of people, society and the Earth by providing solutions to environmental and social issues. Respect for human rights is a fundamental element in achieving our vision. The Mitsubishi Chemical Group Human Rights Policy (the “Policy”), governing all other human rights-related policies within the Group, complements our Mission and Basic Management Policy and outlines our approach to human rights in all of our business activities.

The Policy applies to all officers and members of Mitsubishi Chemical Group companies. We expect all our business partners to understand and act in line with the principles in this Policy.

The Human Rights Due Diligence Committee at Mitsubishi Chemical Corporation is responsible for the implementation of this Policy. The Board of Directors of Mitsubishi Chemical Corporation oversees compliance and implementation of this Policy.

### Respect for Human Rights

We understand our business may have human rights impacts both inside and outside the company throughout our business activities, including research and development, procurement of raw materials, manufacturing, sales of products and services, distribution and disposal. We strive not to cause human rights infringements ourselves, nor to contribute to infringements of human rights caused by others, such as our business partners.

We are committed to respecting human rights understood as, at a minimum, those set out in the International Bill of Human Rights, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. In addition, we support the United Nations “Guiding Principles on Business and Human Rights” and the ten principles of the United Nations Global Compact, and conduct business activities based on these principles.

We comply with the laws of the countries and regions where we operate. If local law requirements contradict internationally recognized human rights standards, we seek ways to honor the principles of international human rights without violating local laws.

### **Human Rights Due Diligence**

Based on the concept of “human rights due diligence”, we work to identify, prevent, mitigate, and account for negative impacts on human rights in which we may be involved. We comply with country-specific laws and regulations related to human rights due diligence, such as the UK Modern Slavery Act, wherever applicable to our operations. This includes mitigating specific human rights risks that fall within the scope of legislation, such as risks related to modern slavery or child labor.

If we identify that we have caused or contributed to human rights infringements, we endeavor to remediate them through appropriate means and processes. Where we find negative impacts on human rights directly linked to our business, we will use our knowledge and expertise, in collaboration with relevant stakeholders, to help mitigate such impacts even if we have not caused or contributed to them.

We recognize the importance of understanding negative impacts on human rights from the perspectives of stakeholders, in particular, affected stakeholders. We are committed to engaging with stakeholders when we consider our action to address potential and actual adverse human rights impacts linked to our business.

### **Human Rights Related to Our Business Activities**

We recognize that addressing the following human rights issues related to our business activities forms an important part of our human rights responsibility.

- **Discrimination**

We strive to maintain workplaces that are free from discrimination based on race, color, gender, age, nationality or national origin, ethnic or social origin, caste, belonging to an indigenous people, family status, disability, health conditions such as HIV/AIDS status, marital status, pregnancy, language, sexual orientation, gender identity, religion, trade union affiliation or political or other opinions.

- **Harassment**

We shall not engage in any behavior that would impair the dignity of an individual, such as harassment in the workplace. We do not tolerate any words or actions that can be constituted as physical or mental harassment, which could make a person feel degraded.

- **Forced Labor**

We shall not engage in forced labor, nor tolerate any form of modern slavery, including bonded labor and human trafficking.

- **Child Labor**

We shall not employ any child under the legal working age as prescribed in national and/or local laws and regulations. We prohibit assigning hazardous or harmful work to young workers.



- Freedom of Association and Recognition of the Right to Collective Bargaining

We respect freedom of association and the right to collective bargaining, and other civil and political rights. We shall continue to develop a favorable relationship between employers and employees through engagement and open dialogue and shall create a workplace culture and environment that places a high value on communication, transparency and teamwork.

- Health and Safety

We shall endeavor to prevent workplace hazards by prioritizing safety over anything else. We shall ensure a safe occupational environment by exercising safety management in accordance with applicable national and/or local laws, and through the voluntary and proactive efforts of each employee. All employees are encouraged to report, without fear of detrimental treatment, any safety issues or concerns.

- Working Hours and Wages

We comply with applicable laws and regulations concerning working hours and wages in countries and regions where we operate. We are committed to setting an appropriate limit on maximum working hours in accordance with local laws, ensuring reasonable rest breaks and holidays, paying allowances in accordance with relevant laws, and prohibiting unfair wage reductions. We strive to create a comfortable working environment and pay due attention to the security and health of employees.

- Privacy Protection

We shall respect and protect the privacy of individuals. In handling personal information, we shall implement procedures to prevent any information loss or leakage in compliance with related laws and regulations.

- Product Use

We conduct thorough quality control to ensure product safety and continuously improve quality. We will listen to the requests of our customers and related stakeholders sincerely, and will continue our efforts to ensure that our products can be used safely and securely in accordance with the basics of Responsible Care activities.

- Business Partners

We will share our position on human rights with all business partners and are committed to working with suppliers and other relevant stakeholders to promote respect for human rights throughout our business activities. We endeavor to integrate consideration of human rights risk during the process of mergers and acquisitions.

- Community

We understand that our business activities may impact the human rights of local communities, such as land rights, access to water, the health of individuals in the community, and the rights of indigenous peoples. In addition to understanding local cultures and customs, we are committed to respecting human rights and acting as a good corporate citizen in communities to meet the expectations of the local communities.

- **Human Rights in High-Risk Situations**

Based on the basic philosophy of respect for human rights, we endeavor with particular care to prevent human rights infringement when we are faced with circumstances with heightened risk, including areas affected by conflicts, natural disasters or a culture of corruption.

Furthermore, we seek to responsibly procure minerals, including managing the risks associated with conflict minerals, by giving due consideration to possible related human rights impacts or environmental burden.

### **Grievance Mechanisms**

If one of our members suspects that there has been an actual or potential violation of applicable laws and regulations or a violation of an internal policy, including this Human Rights Policy, then they can report the case to their supervisor or through our whistle-blowing systems. Received reports are investigated so that corrective actions and recurrence prevention measures can be taken in the event of a compliance violation.

We will continue our efforts to improve the effectiveness of our grievance mechanisms in order to respond appropriately to potential negative impacts on human rights related to our business activities.

### **Education and Training**

We work to raise awareness of human rights within the organization and endeavor to ensure that each member understands issues related to human rights. In addition, we work to integrate human rights in our relevant corporate procedures so that this Policy is embedded throughout our business activities. We will further provide the necessary education and training to our officers and members to provide them with the knowledge and capability to effectively implement this Policy.

### **Utilization of Human Resources and Efforts to Ensure Diversity and Inclusion in the Workplace**

We strive to create an organization where a diverse workforce is able to work in a lively and inclusive manner.

We apply an equal opportunities approach in recruitment, job assignment, promotion, employability and occupational development, and endeavor to develop and utilize human resources.

We aim at creating an environment where each employee is aware of their role, enhances necessary capabilities and respects diverse ways of working.

### **Reporting and Communication**

We will monitor the status of policy implementation, including the status of human rights due diligence, and regularly disclose the progress of our efforts related to our human rights commitments.

This Policy has been approved by the Board of Directors of Mitsubishi Chemical Corporation.

Effective as of March 23, 2020