

## **FY2020 Slavery and Human Trafficking Statement**

### **1. Introduction**

Modern Slavery Statement produced by Mitsubishi Australia Ltd ('MAL'), published in accordance with Section 11 of the Australian Modern Slavery Act 2018 ('MSA'). The Statement sets out the steps we have taken to mitigate risks of modern slavery in our operations and supply chains during the year ended 31<sup>st</sup> March 2021.

### **2. Company overview**

MAL is a wholly owned subsidiary of Mitsubishi Corporation ('MC'), a global integrated business enterprise that develops and operates businesses across virtually every industry, including natural gas, industrial materials, petroleum & chemicals, mineral resources, industrial infrastructure, automotive & mobility, food industry, consumer industry, power solution and urban development. MC's current activities have expanded beyond its traditional trading operations to include project development, production and manufacturing operations, working in collaboration with our trusted partners around the globe. MAL is engaged in a broad range of business, through both trading activities and investments, across our Natural Gas, Mineral Resources, Power, Infrastructure, Urban Development & Machinery, Food & Consumer Industry, and Petroleum, Chemicals & Industrial Materials divisions. The essence behind this diversity is our ability to work with customers and partners to identify their needs and conceive new business models and solutions.

MAL at the date hereof does not own or control any other entities, has a workforce of 55 employees and work with approximately 200 direct suppliers.

### **3. Relevant policies and commitments**

MAL is committed to respecting human rights and strives to ensure that our business activities do not cause or contribute to adverse human rights impacts, including modern slavery. This commitment is expressed through a variety of policies set by our parent company MC. The following policies are available to all employees through our MAL intranet and are communicated through various training sessions throughout the year.

The 'Three Corporate Principles' – Corporate Responsibility to Society; Integrity and Fairness; Global Understanding through Business – have served as MC and MAL's core philosophy

since the company's inception. Building on these Principles, the 'Corporate Standards of Conduct' outline a set of high-level commitments which form the basis of our compliance and risk management systems, while our 'Code of Conduct' provides a set of rules based on national and international standards to ensure that our employees uphold the highest level of ethical conduct in their day-to-day business.

We also have a number of policies related specifically to people. Within the MAL 'Sustainability Framework', we have our 'Social Charter', which outlines our overarching commitments, states that we will "fully respect human rights" and "fully respect fundamental labour rights and endeavour to ensure the provision of proper working environments with consideration of safety, health and other aspects." Additionally within the Framework Document we have the 'Supply Chain Management Policy' and the 'Respect for Human Rights Charter' which elaborates on this further by endorsing various international standards such as the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the core labour standards of the International Labour Organisation, the Voluntary Principles on Security and Human Rights, and the United Nations Global Compact. All of these policies can be found on the MAL web site at <https://www.mitsubishicorp.com/au/en/>

Finally, we will work to share our commitments with key third-party partners to ensure that the goods and services we benefit from do not cause or contribute to modern slavery. The Supply Chain Management Policy requires suppliers to "employ all employees of their own free will with no employee being subject to forced or bonded labour", and addresses other issues pertaining to child labour, freedom of association and collective bargaining, suitable remuneration, prohibition of excessive overtime, and environmental management. We are planning to introduce a 'Modern Slavery and Human Trafficking Memo' for recruitment agencies contracted by MAL. The Memo requires agencies to confirm that they do not charge recruitment fees to prospective employees.

#### **4. Risk assessment**

MAL operates across a range of different industries and our risks reflect this diversity. Through our company-wide Modern Slavery Risk Assessment launched in FY2017 we mapped out our value chains across Business Groups, identified potentially vulnerable workforces, and identifying high risk. While the risks differ for each Business Group, we identified a number of higher risk areas within our value chains.

During this reporting period our main focus has been to establish frameworks and processes to identify, mitigate & control such risks. MAL aims to communicate Modern slavery risks with the wider supply network and reach an agreement on compliance. While the work is still in

progress, we set ourselves to test the effectiveness of our approach periodically and ensure we adapt to the ever-changing landscape of modern slavery risk.

## 5. Due diligence

One of MAL's key roles is to identify new market opportunities and develop business relationships in the region on behalf of MC. As such, the investment proposals which we feed into are screened through MC's due diligence process in Tokyo. In this process, key policies related to Modern Slavery concerns are used to assess the proposals.

In addition, over the next reporting periods, we intend to establish a screening process for our operations and supply chain activities where modern slavery risks or concerns can be identified and / or mitigated prior to conducting business, If any such risks are identified during the process, we will communicate directly with the supplier and request to take remedial steps before commencing any business with the relevant supplier.

This will be an important milestone for MAL in minimising Modern Slavery concerns within our supply chain.

## 6. Awareness-raising and training

At MAL, we have been providing modern slavery training to our employees. In FY2020 we continued to train various employee groups at the board, management and operational levels to refresh and further refine their knowledge. Training operational level employees is particularly important as they are most directly involved in identifying new business opportunities and managing relationships with third-parties.

## 7. Looking ahead

MAL's long term objective is to prevent incidents of modern slavery from occurring in our operations and supply chains and cultivate a healthy working environment where people can thrive. Over the coming year, we aim to establish robust risk assessment processes, test the effectiveness of our approach and continue to build up our Business Groups capacity to conduct modern slavery due diligence. Throughout the year we will continue to work closely with MC to ensure that our commitments and activities remain closely aligned. We will report on our progress in 2022 in MAL's Slavery and Human Trafficking Statement for FY2021.

**8. Approval by MAL's Board of Directors**

I, Hiromasa Yamamoto, hereby certify that the information contained in the above FY2020 Modern Slavery Statement is factual, and that it was approved by MAL's Board of Directors.



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Hiromasa Yamamoto  
Managing Director  
Mitsubishi Australia Ltd

25<sup>th</sup> September 2021