



Modern Slavery Statement

Who we are

Mitsubishi Motors Australia Limited ACN 007 870 395 (**MMAL**) is an Australian Public Company. MMAL is headquartered in Adelaide Airport, South Australia, and is part of the Mitsubishi Motors Corporation based in Tokyo, Japan.

MMAL is the sole importer and wholesale distributor of Mitsubishi vehicles and parts in Australia. MMAL doesn't own or control any other entities.

MMAL employs approximately 227 workers across Australia.

Our operations

As part of its operations MMAL imports Mitsubishi vehicles and parts from Japan and distributes them to Mitsubishi dealerships and service centres across Australia. It also sources other parts and ancillary items connected with the vehicles from suppliers both in and outside of Australia, which are on supplied to Mitsubishi dealerships and service centres. Mitsubishi dealerships and service centres are not owned or controlled by MMAL but rather, operate as separate businesses under franchising agreements with MMAL.

Our supply chains

Vehicles and parts

MMAL sources vehicles from its parent company in Japan, Mitsubishi Motors Corporation (**MMC**) as well as some of MMC's affiliated entities, including Mitsubishi Motors Thailand. Vehicles are manufactured in Japan, Thailand and France. Parts are made and sourced mainly from Japan, Thailand and China.

Other suppliers

MMAL has approximately 900 additional direct suppliers. A large portion of those suppliers provide services to assist with importation and distribution, in the areas of freight, logistics, warehousing, customs, technology, marketing and media. MMAL also sources a number of products from a variety of suppliers in the nature of 'optional extras' and ancillary vehicle items, including canopies, tow bars, oils and lubricants, seat covers, cleaning cloths, reverse cameras and many other items.

The majority of MMAL's direct suppliers are based in Australia. MMAL is continually working to improve its visibility over the origin of source materials used in products supplied to MMAL. To the extent that MMAL is aware, source products come from Australia, China and South East Asia.

Modern slavery risks

MMAL appreciates that risks of modern slavery may be present in its supply chain as a result of the geographic location of some suppliers and source materials used in products supplied to MMAL. In particular, MMAL acknowledges that China and other locations in South East Asia have a higher prevalence of modern slavery.

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In addition to this, metals used in products sourced by MMAL are generally considered to be materials which carry higher risks of modern slavery practices involved in their sourcing.

MMAL also accepts that there are additional risks of modern slavery that may exist in areas where MMAL lacks insight into the second tier suppliers and source materials behind products and services supplied directly to MMAL.

The steps MMAL is taking to address these risks are set out below.

Our approach to modern slavery

Global Approach

Our main supplier and parent company, MMC has taken a number of steps to create awareness around modern slavery and human rights issues and address human rights risks in its operations and supply chain. Some of these actions are summarised below but further detail about MMC's actions to achieve respect for human rights can be found here: https://www.mitsubishi-motors.com/en/sustainability/society/human_rights/

Further information about MMC's approach to achieving a sustainable supply chain can be found here:

https://www.mitsubishi-motors.com/en/sustainability/society/supply_chain_management/

We consider that these actions taken by MMC significantly reduce modern slavery risks in MMAL's supply chain.

Policies

In 2019 MMC enacted a new Human Rights policy, as well as reviewing its Global Code of Conduct to include 'Respect Human Rights and Diversity, Provide Equal Opportunity'. MMC's Human Rights Policy includes a commitment to eliminating unjustifiable labour practices and states that Mitsubishi Motors does not accept any unjustifiable labour practices such as slavery labour, child labour, or forced labour, including human trafficking.

Awareness and training

MMC also offers human rights awareness training company wide, and participates in events held by the Industrial Federation for Human Rights, Tokyo (of which it is a member), and has a Mitsubishi Human Rights Enlightenment Committee. Training programs are tailored for each job rank with respect to human rights. In addition to the training sessions, human rights related information is regularly distributed within MMC to raise awareness of human rights.

MMC also requires its suppliers to consider human rights and have guidelines setting out sustainable development goals. Suppliers are requested to sign and submit a 'supplier commitment' which is based on MMC's Human Rights Policy.

Reporting

MMC has established internal and external consultation offices (helplines) for whistle blowing and consultation for its workers to enable reporting of human rights issues. Similarly, it has also established a Business Partner Helpline for suppliers, and a Customer Contact Centre as a consultation office for customers, though which reports and request for consultations regarding human rights issues can be made.

Local approach

Our operations

MMAL is confident that it has no modern slavery practices within its own operations. We have a dedicated human resources team. We brief external employment and industrial relations lawyers for advice and assistance on matters relating to awards, National Employment Standards and

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employment conditions generally. We also have a number of policies intended to protect the working conditions and human rights of those working in our operations including our Equality in Employment Policy, Workplace Bullying Policy and Grievance Policy & Procedure.

In the next quarter, MMAL will be rolling out MMC's Human Rights policy and Global Code of Conduct to MMAL staff as part of MMC's programme, to ensure a united approach with our main supplier and parent company.

Since 2021 MMAL has had in place a whistleblower program which enables eligible whistleblowers (as defined in the *Corporations Act 2001* (Cth)) to report suspected or actual reportable misconduct (which may include human rights breaches or other illegal activity indicative of modern slavery) via an anonymous hotline. The Whistleblower Policy was most recently reviewed in October 2023 and is scheduled for annual review again in October 2024 to ensure it remains current.

Through these methods we aim to comply with relevant Australian workplace laws, including those that deal with employment conditions and safety, and other community expectations and ethical standards.

Due diligence program

In addition to the global approach outlined above for goods and services sourced through MMC, in the 2023/24 year MMAL has continued to work through its implemented due diligence program, which has the aim to provide MMAL with greater insight into the operations of its suppliers, allowing to continuously assess the risks of modern slavery within its supply chain.

MMAL has updated its onboarding processes to ensure the gathering of information from new and prospective suppliers that come on board, with a view to flagging any modern slavery risks amongst newly appointed suppliers and vendors.

As part of this program MMAL requires its suppliers to answer a variety of questions regarding:

- potential modern slavery risk indicators in their operations; and
- steps taken by the suppliers to identify and address risks of modern slavery in their operations, including information with respect to policies and procedures and contractual obligations imposed on suppliers.

MMAL approves the appointment of new suppliers and vendors after its own evaluation of the information returned by the prospective suppliers and only in the circumstances where MMAL has determined that the information provided by the suppliers does not reveal any specific or significant risk of modern slavery in its supply chain or operations. Most of the potential suppliers also demonstrate that they are proactive in addressing risks of modern slavery and adhere to their own modern slavery and human rights policies.

As part of a broader modern slavery plan, in the 2022/23 year MMAL successfully rolled out updated supplier agreements and purchase order terms, addressing modern slavery. In the 2023/24 year MMAL continued to review existing supplier agreements and purchase order terms and has achieved a result of 90-95% of all contracts with new suppliers and existing vendors containing clauses that address Modern Slavery. These updated terms prescribe that suppliers must:

- comply with modern slavery laws and take reasonable steps to identify and address risks of modern slavery in its supply chains and operations;
- notify MMAL as soon as supplier becomes aware of modern slavery practices, as well as take reasonable action to address or remove these practices;
- comply with any reasonable request by MMAL relating to Modern Slavery laws or necessary to enable MMAL to comply with Modern Slavery laws;
- not do anything that will cause MMAL to breach Modern Slavery laws;

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- provide any assistance, information, access to documents or evidence that MMAL may request in connection with:
 - MMAL's reporting or other obligations under Modern Slavery laws; and
 - verifying its compliance with Modern Slavery laws; and
 - ensure that it has obtained all necessary consents, permissions, licences or authorisations required for MMAL to use and disclose information disclosed by it to MMAL for the purpose of complying with reporting or other obligations under Modern Slavery laws.

MMAL has continued preparing Modern Slavery awareness training for its workforce in the 2023/24 year. Whilst last year saw MMAL roll out training to specific priority teams within MMAL, in 2023/24 the training program has been modified and customised to allow the training to be provided to all employees, both at headquarters and its regional offices in the upcoming months. MMAL's intention is for this important training to be run as an annual program to ensure that new employees are made aware of these issues and that they remain front of mind for existing staff. Providing this training as an annual course will help to raise awareness of Modern Slavery for all employees and assist the MMAL workforce at all levels to be cognisant of the warning signs of Modern Slavery and the responsibility of individual employees to report any potential Modern Slavery red flags within the supply chain

Reviewing our systems

MMAL is committed to continuously assessing and addressing modern slavery risks in its operations and supply chain. MMAL has tasked internal stakeholders with conducting an annual review of the arrangements it has in place to address modern slavery risks in its operations and supply chain to determine whether they are effective.

Consultation

MMAL does not own or control any other entities and therefore, did not need to consult with other entities in the preparation of this statement.

Other information – sustainability

MMAL continues to run its community fleet as part of its sustainability and social impact program. The community fleet involves the supply of Mitsubishi vehicles at no cost to assist with disaster relief and community development. Whilst this program does not directly address risks relating to modern slavery, it is intended to contribute to the improvement of living and working conditions of people in affected areas, thereby enhancing the protection of their basic human rights.

Approved by the Board of Directors of MMAL and signed with authority of the Board of MMAL by



Shaun Westcott
Chief Executive Officer
13 September 2024

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