

MITSUBISHI MATERIALS CORPORATION

2023 Modern Slavery Act Statement

This statement is made in accordance with section 54 of the UK Modern Slavery Act 2015 and discloses the activities undertaken by Mitsubishi Materials Corporation (“Mitsubishi Materials”, “MMC”, the “company”, “our” or “we”) and its subsidiaries (Luvata Oy. and MMC Hardmetal Europe Holdings GmbH) within the scope of this section during the fiscal year April 1, 2023 to March 31, 2024. This statement explains the following, including our Group's human rights initiatives.

- Our Group's Organizational Structure and Business
 - Initiatives to Respect for Human Rights
 - Human Rights Policies and Commitments
 - Supplier Due Diligence
 - Due Diligence within the Group
 - Potential Risks in the Business and Supply Chain
 - Remedial Measures

Our Group's Organizational Structure and Business

The Company was established in 1950 and is headquartered in Tokyo, Japan.

Luvata Oy and MMC Hardmetal Europe Holdings GmbH are subsidiaries of the Company. The total number of employees of the Group, including these 2 companies, is over 18,323 (as of March 31, 2024), and the Group's sales in fiscal 2023 were 1,540,642,000,000 yen.

The Group is mainly engaged in Metals Business, Advanced Products, Metalworking Solutions Business, Energy-related Business and the Environmental Recycling Business. An overview of each business is as follows.

Metals Business

Smelting and sale of copper, gold, silver and palladium.



Advanced Products

Manufacturing and sale of copper products, functional materials, electronic materials and components.

Metalworking Solutions Business

Manufacturing and sale of cemented carbide products

Energy-related Business and the Environmental Recycling Business

Technology development related to environment and energy (geothermal, etc.)

The Company operates in the U.K. either directly or through subsidiaries. An overview of the offices and subsidiaries in the United Kingdom is as follows.

Offices in the United Kingdom

Mitsubishi Materials Corporation London Office

Attending local meetings regarding certification bodies for responsible mineral procurement and collecting related information.

Subsidiaries in the United Kingdom

Luvata Welwyn Garden Ltd. (a subsidiary of Luvata Oy)

Manufacture of resistance welding caps, electrodes and adaptors.

Distribution of welding wire and consumables.

Dawson Shanahan Holdings Ltd., (a subsidiary of Luvata Oy)

Copper processing business.

As Luvata Oy acquired Dawson Shanahan Ltd. on May 3, 2024 and Dawson Shanahan Ltd. became the MMC's group company, measures taken by Luvata Oy during the reporting period are not included in the measures taken by MMC or Luvata Oy. The measures taken by the MMC Group will be applied from May 3, 2024.

It consists of 3 companies.;

Dawson Shanahan Holdings Ltd., has 2 subsidiaries, Dawson Shanahan Ltd. and



Dawson Shanahan(Wales) Ltd.

MMC Hardmetal U.K. Ltd. (a subsidiary of MMC Hardmetal Europe Holdings GmbH)

Distributor and sales organisation of manufactured products by our parent organisation.

(sales agent for the Company's manufactured products, which is the parent company)

Our Group's Initiatives of Respecting for Human Rights

Since 2022, We have been working on the following three issues in accordance with the United Nations Guiding Principles on Business and Human Rights in order to prevent and mitigate the adverse effects of its businesses on human rights, including the risks of forced labour and child labour.

- Dissemination of commitment to human rights policy
- Implementing Human Rights Due Diligence (“human rights DD”)
- Remedial Measures

Our Group are promoting human rights DD to assess the adverse impacts of our business on human rights, respond to the results of the assessment, follow up on the responses, and disseminate information on these initiatives to Group companies, sites, and suppliers in Japan and overseas.

Our Human rights DD adopts a risk-based approach using a Self-Assessment-Questionnaire (SAQ:). The SAQ identifies human rights risks, including the risks of forced labour and child labour, and prioritizes risk reduction measures in areas deemed high-risk.



Policies and Commitments Related to Human Rights

Policies	Description
Code of Conduct	<p>We have established a code of conduct to foster an ethical corporate culture and organizational culture.</p> <p>It consists of five chapters: Respect for Human Rights, Safety First, Compliance, Mutual Prosperity and Environmental Management.</p>
Sustainability Policy	<p>Commitment to further accelerate our proactive engagement with sustainability to achieve sustainable growth as a corporate group.</p>
Human Rights Policy	<p>"Human Rights Policy of the Mitsubishi Materials Group" (the "Policy") was established based on the Sustainability Policy.</p> <p>It is committed to identifying, preventing and improving the adverse impacts of the Group's business on human rights in all areas of its business activities and to promoting efforts to respect human rights, including the prohibition of forced labour and child labour.</p>

Commitments	Description
UN Global Compact	<p>This agreement supports the 10 principles of the Global Compact, which consists of four areas: human rights, labour, environment, and anti-corruption.</p>

Due Diligence on Suppliers

Overview of Due Diligence on Suppliers

In conducting procurement, Our group established the Procurement Policy, and Our group is committed to respecting internationally declared human rights principles. The Procurement



Policy sets forth our responsibilities for fair trade, respect for human rights, legal compliance, procurement ethics, occupational health, environmental protection, and information security in addition to child labour and forced labour.

Our group has also established the CSR Procurement Guidelines for suppliers excluding copper mines. Our CSR Guidelines are composed of Procurement Basic Policy and CSR Procurement Standards that requests suppliers to comply with. In accordance with our Procurement Policy, our group requires our suppliers to respect human rights, etc. Our group also requires our suppliers to respect human rights in our CSR Procurement Standards and to refrain from discrimination in recruitment and treatment, harassment, child labour and forced labour, human trafficking, and unfair low-wage labour.

In addition, the CSR Procurement Guidelines are disseminated to suppliers, and agreements are concluded after mutual confirmation of the contents.

The Group companies plan to establish a system of due diligence for suppliers from 2024.

Supplier Assessment

To ensure the effectiveness of initiatives at our suppliers, we conduct supplier recruitment audits and supplier evaluations, which have been in place since April 2016, and conduct on-site audits as necessary.

Before starting transactions with new suppliers, we request that they conduct self-evaluations using a Supplier Self-Check Sheet. This self-check sheet consists of items that assess their initiatives on social responsibilities related to human rights (such as child labour, forced labour, and unreasonably cheap labour) and procurement (including negative environmental impact), in addition to general items such as quality, cost and delivery. The Procurement & Logistics Division assigns scores based on responses to the 12 evaluation items on the Self-Check Sheet, and determines handling based on the total evaluation score.

Based on our rules, we request that existing suppliers evaluate themselves every other year using the Supplier SAQ, thereby checking the progress of their initiatives. In addition, when control is required for each item such as main raw materials, we use the "Supplier Evaluation Sheet" to conduct a comprehensive performance evaluation consisting of a total of 28 review items including forced labour and child labour, and we respond to suppliers with poor performance

evaluation as high risk.

The Group companies plan to establish a system for conducting supplier assessments from 2024.

MMC's Activity Results During the Reporting Period

- SAQ for suppliers were submitted by 300 companies (Response Rate: 100%)
- We provided feedback of SAQ to 263 companies (Implementation Rate : 88%)*.

(Note) As of the end of March 2024. The rate is 100% as of the end of May 2024.

Procurement of Copper Concentrate

We procure copper concentrate, a raw material for copper products, primarily from the overseas mines in which we invest, to ensure a stable supply to smelters. While we are in the position of non-operators, not directly involved in mine management, as a company engaged in global procurement activities, we hope to fulfill our sustainable development responsibilities.

We place importance on dialog with Indigenous peoples and members of local communities. We assign specific staffs to participate in the advisory committees of mines in which we have a certain scale of interests.

Moreover, our Metals Company requires the mining companies to comply with CSR Investment Standards (if we are investing) and CSR procurement standards before we invest in them. We also check the status of compliance with those standards, for example through regular questionnaire surveys, and as necessary seek to understand and improve the situation.

We also regard environmental preservation and respect for human rights as important matters to consider in management of the global supply chain and have incorporated these considerations into our business processes.

Due Diligence on Mitsubishi Materials and Our Group Companies

Overview

In 2022, the Group began building a human rights DD system within the Group. Subsequently, in 2023, we distributed SAQ to all 105 Group sites and Group companies, and analyzed the



responses to identify human rights risks.

The SAQ developed questions based on international human rights and work-related sustainability standards, such as the United Nations Guiding Principles for Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct, and the ILO Core Labour Standards (5 Areas and 10 Conventions), with input from external experts. The SAQ covers key areas related to human rights in 20 areas, including child labour and forced labour, and identifies areas of risk where the operations of the Our sites and our group companies adversely affect human rights.

As a result of analysis of responses to the SAQs distributed in 2022 and 2023, the Group identified human rights risks such as harassment, discrimination in the employment process, and procurement of raw materials. To reduce these risks, we will further strengthen our existing efforts to create an organizational culture that prevents harassment and to promote responsible procurement. At the same time, we will consider efforts to prevent discrimination in the employment process.

In addition, in order to continue implementing human rights DD in the future, we have formulated the “Mitsubishi Materials Group SAQ Internal Operation Manual.” The manual reflects the knowledge gained from our efforts in 2022 and 2023 and covers the assessment and identification of human rights risks, as well as the planning and implementation of follow-up and improvement plans.

Training

The Group believes that respect for international human rights standards, as well as compliance with laws and regulations in each country, is essential for its global operations. Therefore, in December 2021, we formulated our Human Rights Policy. Based on this policy, the Group is strengthening its initiatives of respecting human rights, including the prohibition of forced labour and child labour.

In addition, we conduct human rights training for employees in Japan and overseas in order to penetrate them with these policies regarding respect for human rights and the human rights risks and issues we are facing.

In addition, initiatives and examples of respecting human rights are handled in governance



training for directors of our company and our group companies in Japan and overseas, and compliance training for managers of overseas group companies.

These training sessions are positioned as opportunities to cultivate global human rights awareness and to understand corporate responsibility.

Potential Risks in Operations and Supply Chains

Addressing Potential Risks in Our Group's Business

Our group has determined that the potential risk of forced labour and child labour in our business is low.

The SAQ includes questions on modern slavery and human trafficking, all of which confirm that risk mitigation measures are implemented at most sites.

Addressing Potential Risks in Our Supply Chain

In response to our efforts to mitigate the risk of modern slavery and human trafficking in our supply chain, we have obtained sustainability certification for minerals such as copper, gold, silver, tin, and lead.

In addition, the SAQ, which is used for human rights DD in our sites, assesses human rights risks by including questions on forced labour and child labour.

Remedial Measures

Our group has established a report and consultation desk for employees to receive reports and consultations on human rights. The desk accepts anonymous reports and consultations, guarantees strict confidentiality, and has a system to implement remedies. There were no reports or consultations regarding forced labour or child labour at the employee desk during the reporting period.

In addition, our group has established a human rights inquiry desk that is accessible to our external stakeholders. This inquiry desk can be consulted anonymously.


Assessing Effectiveness

As Mitsubishi Materials Group continues the development of its program to prevent and reduce the risks of forced and child labour in its supply chains and operations in 2024, it will consider and implement measures to assess the effectiveness of these processes.

Resolution and Signature

This statement was made on behalf of Mitsubishi Materials Corporation, the Luvata Oy and MMC Hardmetal Europe Holdings GmbH, and was approved on Sep. , 2024, Strategic Management Meeting with the participation of executive officers, including the President and Chief Executive Officer of Mitsubishi Materials Corporation. President and Chief Executive Officer Naoki Ono will then sign this statement on behalf of the Company.

We confirm the information contained in this statement in accordance with the requirements of this Act and certify that it is true, accurate and complete in all material respects for the applicable reporting period and for the purposes of this Act.



Name: Naoki ONO

Title: Chief Executive Officer, Mitsubishi Materials Corporation.