

MITSUBISHI MATERIALS CORPORATION

2025 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 within the scope of this section (the Luvata Group and Mitsubishi Materials Tools Europe GmbH) during the fiscal year from April 1, 2025 to March 31, 2026. 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 Mitsubishi Materials Tools Europe GmbH are subsidiaries of the Company. The total number of employees of the Group, including these 2 companies, is 17,591 (as of March 31, 2026), and the Group's sales in fiscal 2025 were 1,844,053,000,000 yen.

The Group is mainly engaged in the Metals Business, Advanced Products, the Metalworking Solutions Business, and the Energy-related and 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 and electronic devices.
- Metalworking Solutions Business
 - Manufacturing and sale of cemented carbide products.
- Energy-related Business and Environmental Recycling Business
 - Technology development related to the 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



Supporting the promotion of the Metals Business in Europe and collecting related information.

- Subsidiaries in the United Kingdom

Luvata Welwyn Garden Ltd.

Manufacture of welding products, like resistance-welding electrodes, adaptors, MIG contact tips and other welding consumables.

Luvata Welshpool Limited.

Manufacture of Diesel and Hydrogen Injector Sleeves, EV, PHEV and Industrial Connectors, Vacuum Interrupters, and Plasma Shields.

MMC Hardmetal U.K. Ltd.

Distributor and sales agent for the Company's manufactured products.

- **Our Group's Initiatives to Respect 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 our business activities on human rights, including the risks of forced labour and child labour.

- Dissemination of our commitment to human rights policy
- Implementing human rights due diligence ("human rights DD")
- Remedial measures

Our Group is 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.

- **Human Rights Policies and Commitments**

Policies	Description
Code of Conduct	We have established a code of conduct to foster an ethical corporate and organizational culture. It consists of five chapters: Respect for Human Rights, Safety First, Compliance, Mutual Prosperity and Environmental Management.
Sustainability Policy	Commitment to further accelerate our proactive engagement with sustainability to achieve sustainable growth as a corporate group.
Human Rights Policy	The Human Rights Policy of the Mitsubishi Materials Group (the



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	"Policy") was established based on the Sustainability Policy. This Policy 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.
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Commitments	Description
UN Global Compact	This agreement supports the 10 principles of the Global Compact, which consists of four areas: human rights, labour, the environment, and anti-corruption.

- 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 Procurement & Logistics Department has also established CSR Procurement Guidelines. These guidelines are composed of the aforementioned Procurement Basic Policy and the CSR Procurement Standards that our suppliers are required to comply with. In accordance with our Procurement Policy, we require our suppliers to respect human rights, etc. Furthermore, our CSR Procurement Standards require suppliers to uphold fundamental human rights, including the provision of appropriate working conditions, freedom of association, and the establishment of internal reporting systems, and to assume responsibilities equivalent to those outlined in our Procurement Policy.

We ensure that business partners are kept informed of any updates to the CSR Procurement Guidelines. In addition, we and our business partners mutually confirm the contents of the CSR Procurement Guidelines and conclude agreements.

- Supplier Assessment

To ensure the effectiveness of initiatives implemented with 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 Supplier Self-Check Sheet not only covers conventional items, such as quality, price and delivery time, but also includes checks on efforts to address social responsibilities, such as human rights (child labour, forced labour, and unreasonably cheap labour) and procurement (including negative environmental impact). The Procurement & Logistics Department assigns scores based on responses to 12 evaluation criteria on the Supplier Self-Check Sheet, and determines



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initiatives based on the total evaluation score.

In addition, for existing suppliers, every two years we conduct self-evaluations using the Supplier Self-Check Sheet to confirm progress in their initiatives. Furthermore, for items such as key raw materials that require management by product category, we use a Supplier Evaluation Sheet based on a total of 28 evaluation criteria, including the prevention of forced labour and child labour, to identify risks across the supply chain and provide the necessary corrective guidance.

In fiscal 2025, in the materials procurement area, we established and commenced operation of a periodic evaluation framework utilizing a new procurement system. After improving the Supplier Evaluation Sheet and providing explanations to each site, supplier evaluations were conducted through the system at each site, and risk assessments and follow-up activities were carried out for a total of 264 suppliers, including both key suppliers and other suppliers. For key suppliers, corrective action deadlines were established, and confirmation of corrective measures was conducted within the designated timeframes. For the five suppliers identified as high risk, feedback sheets were provided to indicate deficiencies, and requests were made to confirm and comply with the CSR Procurement Guidelines and other related requirements. In addition, improvement items were clarified by utilizing examples of risk mitigation measures, and continuous follow-up was conducted. Suppliers were also informed that contract reviews could be considered if necessary in order to encourage improvements. For other suppliers, risk assessments were conducted using the Supplier Self-Check Sheet. For the five suppliers identified as high risk, government guidelines, the Company's Human Rights Policy, CSR Procurement Guidelines, and human rights feedback materials were distributed. As a result, responses were received from all five suppliers confirming their understanding of the importance of respecting human rights and the necessity of compliance.

In addition, in the non-materials procurement area, the results of the risk assessments were shared with all suppliers that responded to the SAQ among the 275 suppliers with annual transaction amounts of 5 million yen or more for whom risk assessments and corrective actions had already been implemented, and additional follow-up was conducted for the four suppliers identified as requiring further follow-up.

- 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.

Our Metals Company requires mining companies to comply with Sustainability Investment and Financing Guidelines (for companies in which we invest) 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 seek to understand and improve conditions when necessary.

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



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- 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 the SAQ to all 105 Group sites and companies, and analyzed the responses to identify human rights risks.

The SAQ established questions based on international human rights and work-related sustainability standards, such as the United Nations Guiding Principles on 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 our sites and our group companies adversely affect human rights.

Based on an analysis of the responses to the SAQs distributed in fiscal 2022 and fiscal 2023, the human rights risks identified within our Group include the “prohibition of discrimination,” “harassment,” “respect for freedom of association and the right to collective bargaining,” and “responsible sourcing of raw materials and minerals.”

In fiscal 2024, in order to mitigate these risks, we conducted lectures and training sessions incorporating role-playing exercises aimed at preventing harassment. In addition, to promote responsible procurement, we expanded the scope of supplier evaluations and further disseminated and reinforced awareness of the CSR Procurement Guidelines and related initiatives.

In fiscal 2025, based on the “Corrective Action Reports” and “Risk Mitigation Action Plans” collected from each site following the SAQ implementation, we decided to focus on the four identified human rights risk areas and to demonstrate and evaluate the effectiveness of the measures taken. Furthermore, as part of efforts to improve SAQ operations, we reviewed questions that were difficult to understand and made improvements to enhance data aggregation, comparability, and analytical accuracy.

From fiscal 2026 onward, we will place particular emphasis on the two areas that present the greatest risks in our business activities, namely harassment and responsible sourcing of raw materials and minerals, and will continue to address these issues in a focused and ongoing manner.

- 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 aimed at respecting human rights, including the prohibition of forced labour and child labour. We signed the United Nations Global Compact in March 2022 and are continuing our efforts to realize its principles.

In addition, we also conduct human rights training for employees in Japan and overseas in order to promote understanding of various human rights issues from the perspective of these policies on respect for human rights and stakeholders who are affected by human rights.



- In governance training programs for directors and officers of our domestic and overseas Group companies, we addressed corporate risks arising from harassment. In addition to explaining risks such as litigation and reputational damage, we shared past case examples and emphasized the importance of appropriate decision-making and preventive actions by executives.
- As part of compliance training for overseas Group companies, we first introduced the Group's initiatives to respect human rights and then presented case-study videos illustrating human rights issues that may arise in daily business operations. Approximately 7,200 employees were encouraged to complete this training.
- Our Group designates October each year as Corporate Ethics Month and conducts compliance training for employees of the Company and its domestic Group companies. In the fiscal 2025 training, participants viewed case-study videos on harassment and engaged in group discussions. The training also incorporated cases based on actual incidents within the Company, as well as examples illustrating the risk of guidance turning into logical harassment, with the aim of deepening understanding of appropriate communication and supervisory practices.
- We have implemented human rights training for all employees, and as of March 2025, more than 4,800 employees have participated in the program. In addition, the training, which is conducted especially at the juncture of employment and promotion, includes content to deepen understanding of human rights issues such as discrimination and harassment.

- **Potential Risks in the Business and Supply Chain**

- **Addressing Potential Risks in Our Group's Business**

Our Group has determined that the potential risk of modern slavery and human trafficking in our business is low.

The SAQ includes questions on forced labour and child labour, all of which confirm that risk mitigation measures are implemented at most sites.

- **Addressing Potential Risks in Our Supply Chain**

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

The Supplier Self-Check Sheet also includes questions concerning the risks of forced labour and child labour, enabling us to assess human rights risks in the supply chain based on these answers. Based on the results of the analysis of the Supplier Self-Check Sheet, we have determined that the risk of forced labour and child labour in the supply chain is low.

- **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 in place to implement remedies. There were no reports or consultations regarding forced labour or child labour at



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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**

Under the supervision of the responsible executive officer, Mitsubishi Materials continuously develops its program and assesses the effectiveness of these processes to prevent and reduce the risks of forced and child labour in its supply chains and operations.

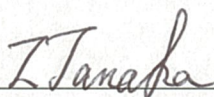
For example, based on the results of analysis of the SAQs conducted in fiscal years 2022 and 2023 for Group sites and companies, we identified human rights risks requiring action and implemented risk mitigation measures at those sites and group companies accordingly. As of February 2025, 225 of the 232 identified risk items had been addressed (a completion rate of 97.0%). The implementation status of these risk mitigation measures is regularly reported to the SCQ Promotion Office, which is headed by the Executive Officer and President, with the responsible executive officer serving as deputy head and department heads from relevant departments serving as members. Through this structure, we have established a system that actively promotes the reduction of human rights risks. In addition, the progress of risk reduction measures and good practices are actively shared with business and corporate managers.

- **Resolution and Signature**

This statement was made on behalf of Mitsubishi Materials Corporation, Luvata Oy and Mitsubishi Materials Tools Europe GmbH, and was approved on September 7, 2026, at the Strategic Management Meeting with the participation of executive officers, including the Executive Officer and President, of Mitsubishi Materials Corporation. Executive Officer and President Tetsuya Tanaka 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.

(Signed)



Name: Tetsuya Tanaka

Title: Executive Officer and President, Mitsubishi Materials Corporation



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