

**Subject: Fighting Against Forced Labour and Child Labour in Supply Chains Act FY 2023 Statement**

**Company Name: Mitsubishi Electric Power Products, Inc. (“MEPPI”)**

**Effective Date: May 31, 2024**

**Next Review: May 2025**

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**1. MEPPI’s Commitment to Fighting Against Forced Labour and Child Labour (FY 2023)**

This is MEPPI’s first statement under the Fighting Against Forced and Child Labor in Supply Chains Act of 2024 (the “Act”). This statement includes our ongoing commitment to respect international standards on human rights, to respect the law, to act with the highest integrity, and to always act with respect for human rights.

This statement is prepared for MEPPI, a member of the Mitsubishi Electric family of companies (the “Mitsubishi Electric Group” or “Group”).

This statement outlines the steps MEPPI and the Mitsubishi Electric Group have taken through FY2023, and continue to take, to address the risks of forced labor and child labor in operations and supply chains in accordance with the Act. The FY 2023 refers to the period from April 1, 2023 to March 31, 2024.

**2. Basic Information on MEPPI**

MEPPI, a Delaware corporation with its corporate office located in Warrendale, Pennsylvania, is a wholly owned subsidiary of Mitsubishi Electric Corporation (“MELCO”), a Japanese corporation publicly traded on the Tokyo Stock Exchange.

MEPPI serves the North American power systems, rail transportation, and large visual display markets with electrical and electronic products, systems and services. The products offered by MEPPI include gas circuit breakers, vacuum circuit breakers, power transformers, gas-insulated substations, power electronics and electricity transmission technologies including high voltage DC, battery energy storage systems, generator

services, nuclear power plant control systems, uninterruptible power supplies, rail transportation on-board and wayside equipment, and high-definition LED displays for sports, commercial, and retail installations under the Diamond Vision product offering.

Through various of its divisions, MEPPI sells certain electrical equipment products to customers located in Canada.

MEPPI has approximately 1,000 employees, most of whom are located in the United States and employs less than 5 employees in Canada.

### **3. Human Rights Activities Structure**

The Mitsubishi Electric Group promotes continuous improvement activities based on the PDCA cycle in order to promote human rights due diligence and other initiatives in accordance with international norms such as “The UN Guiding Principles on Business and Human Rights”. The Sustainability Committee, which is commissioned by the Executive Officers’ Meeting, formulates policies and plans for human rights initiatives, checks their performance, and receives approval from higher-level organizations, etc.

In FY2022, MELCO established a permanent Human Rights Subcommittee as a subordinate organization of the Sustainability Committee in order to promptly improve the content of human rights-related initiatives and resolve issues. Since issues related to human rights cover a wide range of areas, MELCO will work on them after clarifying the divisions in charge of them. The Human Rights Subcommittee determines the direction of discussions on cross-divisional issues. Progress and results are reported to the Sustainability Committee, which in turn reports them to the Executive Officers’ Meeting and the Board of Directors, where they receive guidance and supervision from the Executive Officers and Directors.

In FY2023, the Human Rights Subcommittee was held 3 times and the Human Rights Working Group, which is a subordinate body of the Human Rights Subcommittee and consists of working members, was held 11 times.

As a member of the Mitsubishi Electric Group, MEPPI follows the Mitsubishi Electric Group Human Rights Activities Structure. In addition, MEPPI has established a Legal Compliance Committee to work with all MEPPI employees to ensure awareness of company policies and procedures, including its Business Ethics and Legal Compliance Policy, and compliance with all applicable laws, regulations and requirements. The committee meets 2 times each year to review the company’s overall compliance program and consists of all members of MEPPI’s senior and executive staff.

### **4. Human Rights Policy and Process**

In 2017, the Mitsubishi Electric Group formulated and published “The Mitsubishi Electric Group Human Rights Policy”. The Mitsubishi Electric Group regards it as our responsibility to support and respect the protection of internationally agreed-upon human rights as a precondition for our corporate activities, and to ensure that we ourselves are not complicit in human rights abuses. The Mitsubishi Electric Group recognizes that international standards on human rights, such as “The International Bill of Human Rights” and “The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work”, are minimum standards to be observed. Based on this recognition, the Group declares that we will appropriately understand the laws, regulations, and rules of each country and region in which we operate, and that we will respect human rights.

The Mitsubishi Electric Group signed “The Ten Principles of the United Nations Compact” on Human Rights, Labor, Environment and Anti-Corruption in 2018. The entire Mitsubishi Electric Group is committed to implementing policies and procedures consistent with its moral and ethical obligation to end modern-day slavery.

In order to implement the contents of the Human Rights Policy, the Mitsubishi Electric Group conducted Human Rights Impact Assessments in 2018, 2021, and 2023 to identify risks of human rights violations, including forced labour and child labour, and to correct, prevent, and mitigate negative impacts based on the identified results.

The Mitsubishi Electric Group is committed to efforts to promote human rights due diligence in our Human Rights Policy. The Human Rights Subcommittee, consisting of the heads of related divisions of the Mitsubishi Electric Group, determines the direction of cross-divisional human rights issues, and reports the progress of human rights respect initiatives to the Sustainability Committee and the Executive Officers' Meeting. Through the guidance and supervision of executive officers and directors, the effectiveness of the PDCA cycle for human rights due diligence is continuously checked.

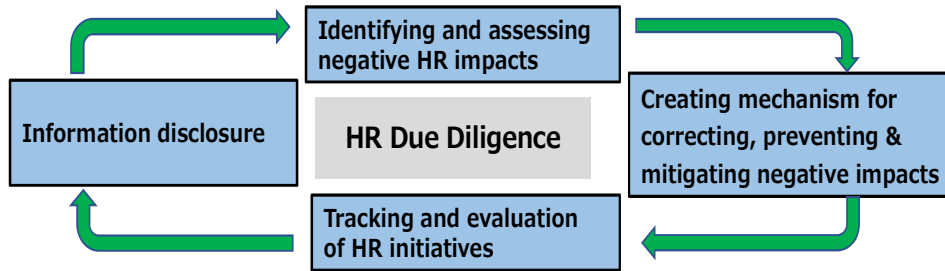
Additionally, as a member of the Mitsubishi Electric Group, MEPPi adheres to the Group Code of Conduct which provides:

***Respect for Human Rights:***

- 1. We respect human rights and ensure we adequately understand relevant laws and regulations of the countries and regions in which we conduct business. We strive not to violate any human rights.*
- 2. We request cooperation from various stakeholders involved in the whole value chains of our business activities, products and services to help promote respect for human rights in society at large.*
- 3. If we receive any complaint or consultation regarding human rights from various stakeholders, or if we see or hear any behavior that infringes upon human rights in Mitsubishi Electric Group activities, we promptly contact the department in charge so that measures can be taken to resolve it.*

**5. Human Rights Due Diligence Approach**

To address the various risks of modern-day slavery, the Mitsubishi Electric Group has adopted a human rights due diligence approach as outlined in “The UN Guiding Principles on Business and Human Rights” and “The OECD Due Diligence Guidelines”. The Mitsubishi Electric Group's human rights due diligence is based on the processes and tools of the Responsible Business Alliance (RBA), which MELCO joined in February 2022, being deployed throughout the Group and the Group supply chain. A new Group-wide activity was launched in FY2023 that actively utilizes the knowledge of external third-party organizations.



Activities at each step of the Mitsubishi Electric Group's human rights due diligence:

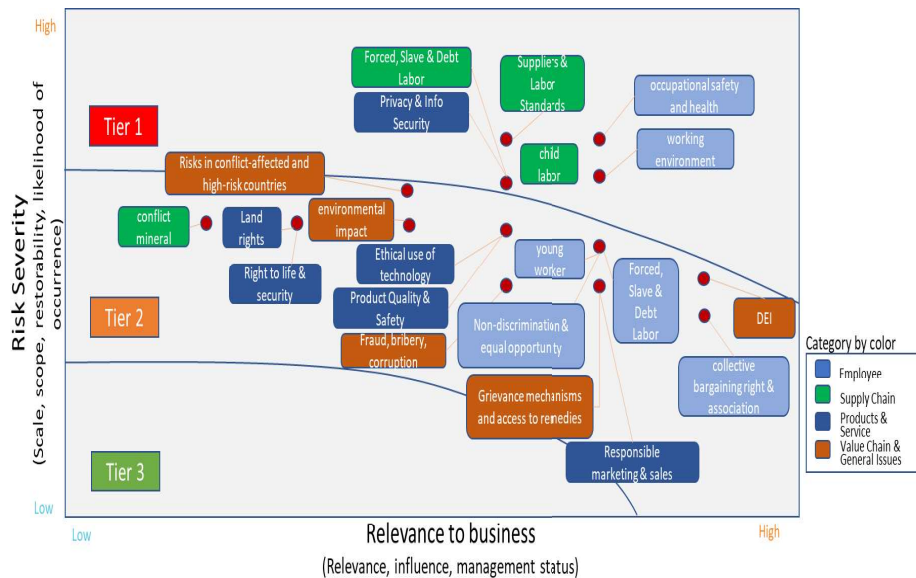
**(A) Identifying and assessing negative human right impacts**

**(i) Human Rights Impact Assessment (self-assessment) - Previous Activities**

In FY2021, MELCO conducted self-assessments using Mitsubishi Electric's original format at 406 sites, including Japanese and overseas affiliates of the Group, to investigate the existence of human rights risks and the status of efforts to respect human rights at each site.

**(ii) Human Rights Impact Assessment (third-party evaluation) - New Activities**

In FY2023, MELCO conducted a new "Human Rights Impact Assessment" in collaboration with a third-party organization, Business for Social Responsibility (BSR). As a result, the Group identified twenty-one (21) potential human rights risks, including forced labour and child labour risks in the entire value chain of the Mitsubishi Electric Group. BSR presented 86 recommendations for the Mitsubishi Electric Group's corporate activities (including supply chain).



**(B) Creating mechanisms for correcting, preventing & mitigating negative impacts**

(i) Each site is responsible for promoting improvement activities for issues identified in the "self-assessment" conducted in FY2021.

(ii) For the 86 items recommended by BSR in the "third-party evaluation" conducted in FY2023, each division in charge has formulated an improvement plan with the goal of completing improvement measures by the end of FY2026, and has started activities. (please refer to Section 8 for details)

(C) Tracking and evaluation of human rights initiatives

(i) Tracking and evaluation within the Mitsubishi Electric Group:

(a) MELCO was checking the status of improvement at each site in FY2022 and FY2023 with regard to issues identified in the "self-assessment" conducted in FY2021, and the plan is to continue checking the status in FY2024.

(b) MELCO will also annually check the status of improvement implementation for the 86 recommendations presented by BSR in FY2023.

(c) In addition, from FY2024 onward, the RBA's Self Assessment Questionnaire (SAQ) will be used to confirm whether the risk of forced labour, child labour, etc. is being reduced at each Mitsubishi Electric Group site. Operation will begin at Japanese sites in FY2024 and will be expanded to additional Japanese and overseas group sites in FY2025.

(ii) Tracking and evaluation in the supply chain

(a) The Mitsubishi Electric Group uses "CSR Procurement Guidelines" and "CSR Questionnaire" to check the status of human rights initiatives in its supply chain, and is preparing to shift these activities to conform to the RBA process from FY2024. (please refer to Sections 7 & 8 for details)

(D) Information disclosure

(i) MELCO discloses our activities in our Sustainability Report<sup>1</sup> and Integrated Report<sup>2</sup> every year.

**6. Grievance Mechanism**

The Mitsubishi Electric Group accepts inquiries and complaints from all stakeholders in the Mitsubishi Electric Group's global value chain 24 hours a day, 365 days a year through the following two contact points:

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<sup>1</sup> <https://www.mitsubishielectric.com/en/sustainability/reports/index.html>

<sup>2</sup> [https://www.mitsubishielectric.com/en/investors/library/integrated\\_report/index.html](https://www.mitsubishielectric.com/en/investors/library/integrated_report/index.html)

Point	User	Contents (What, Who)	Language
(1) Sustainability Inquiries desk	All the stakeholders (Everyone in Value chain including Mitsubishi Electric Group employee)	Inquiries about the sustainability of Mitsubishi Electric Group (including Human Rights) and various other inquiries about the corporate activities	Japanese English
(2) External desk on Human Right (operated by JaCER)	Everyone in Supply chain (others can if they wish)	Consultation desk for Human Rights violations mainly in the supply chain of the Mitsubishi Electric Group	Japanese English Chinese

In addition, MEPPi has an internal whistleblower hotline which allows for 24 hour a day, 365 days a year anonymous reporting of a wide range of issues, including human rights concerns.

Neither the Mitsubishi Electric Group nor MEPPi has received any reports of forced labour or child labour through the multiple contact points they have established.

## **7. Supply Chain**

MEPPi procures goods and services from its parent company, MELCO. MEPPi also procures goods and services from other Mitsubishi Electric Group companies.

MEPPi additionally sources goods and services from other suppliers to meet its business needs when required.

### **(A) Identification and remediation of risks of serious human rights violations (forced labour, child labour) in the supply chain**

Every three years, the Mitsubishi Electric Group obtains responses to a survey from suppliers representing the top 80% of its purchases in order to verify suppliers' efforts to meet the requirements of "CSR Procurement Guidelines". Through this survey and the confirmation of the survey responses, the Group identifies high-risk suppliers by individually determining whether there is a particularly serious risk of human rights violations, such as forced labour and child labour, and if we do identify a risk, we continuously seek to correct it through dialogue with the supplier. In the latest survey in FY2022, the Group has not identified any suppliers with such serious human rights violation risk concerns. In addition, the Mitsubishi Electric Group has also included the reduction of excessive working hours and the right to minimum wages in our guidelines, and are in the process of confirming this in the survey form.

### **(B) Transition to RBA compliant initiatives**

In FY2022, the Mitsubishi Electric Group used the current "CSR Procurement Guidelines", and in FY2023, the Group established a new "Mitsubishi Electric Group Supplier Code of Conduct" in compliance with the RBA Code of Conduct and are working to obtain written confirmation of agreement to the Code of Conduct from all suppliers. In addition, the Group is working to implement SAQ provided by the RBA for the top 80% of suppliers in terms of purchases.

### **(C) Promoting Responsible Mineral Procurement Activities**

The Mitsubishi Electric Group adheres to “The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas”, and removes certain minerals from the procurement supply chain in situations where their procurement encourages or contributes to serious human rights violations or environmental destruction.

MELCO takes part in “The Responsible Minerals Trade Working Group” of the Japan Electronics and Information Technology Industries Association (JEITA), and addresses restrictions on conflict minerals in cooperation with other industry organizations. Surveys are conducted using the survey forms (CMRT<sup>3</sup> and EMRT<sup>4</sup>) that are commonly used in the automobile, electric, and electronic industries. In FY2022, surveys were carried out on 658 suppliers, and responses in survey form were obtained from 575. As a result of the survey, 350 smelters were identified. Of the identified smelters, 165 were RMAP<sup>5</sup> compliant. The Mitsubishi Electric Group will continue to promote RMAP compliance among smelters through industry activities.

## **8. Process for Identifying and Assessing the Risk of Forced Labour and Child Labour in Operations and Supply Chains, and Corrective Actions**

### **(A) Identification and assessment of risks to the Mitsubishi Electric Group**

Forced labour and child labour within the Group and in the supply chain were identified as one of the potential risks in the Human Rights Impact Assessment (third-party assessment) conducted in FY2023. For human rights violation risks identified in the Impact Assessment, we have designated a division in charge, which is responsible for correcting, preventing, and mitigating negative impacts.

### **(B) Risk assessment and measures taken in the Mitsubishi Electric Group supply chain**

In the Mitsubishi Electric Group supply chain, the Group implements a due diligence process for risk assessment and verification as part of our CSR procurement activities.

- (i) We hold briefing sessions for our suppliers to provide an opportunity to explain the Mitsubishi Electric Group's sustainability initiatives and social trends surrounding business and human rights.
- (ii) We request suppliers to sign a form confirming their agreement to our “Group CSR Procurement Guidelines”.
- (iii) We confirm the risks to suppliers through “CSR questionnaires” and requests for improvements based on evaluation results.

The use of the RBA tool in the guidelines and CSR questionnaire to be implemented from FY2023 is expected to improve the objectivity and accuracy of risk management for forced labour and child labour in the supply chain.

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<sup>3</sup> Conflict Minerals (tin, tantalum, tungsten, and gold) – reporting template issued by The Responsible Minerals Initiative

<sup>4</sup> Cobalt and Mica – reporting template issued by The Responsible Minerals Initiative

<sup>5</sup> Responsible Minerals Assurance Process – a program in which a third-party certifies that the minerals processed by a smelter come from sources that are not complicit in conflicts or human rights abuses

(iv) If we identify a high-risk supplier, we will evaluate compliance and consider a more detailed verification process to address the situation and remedy any violation.

(v) All of the above procedural controls are regularly reviewed to ensure that robust processes are in place to minimize the risk of modern-day slavery in our operations and supply chain.

In addition, MEPPi performs a semi-annual review of all vendor payments made to high-risk countries who have a Global CPI Index score of less than 50. Details of the transactions and invoices are reviewed relating to external factors, including regulatory scrutiny (social governance and anti-bribery).

## **9. Training for Employees on Forced Labour and Child Labour**

MELCO conducts an annual e-learning program on "Sustainability in the Mitsubishi Electric Group," which includes education on human rights. The number of participants in FY2023 was 40,213 from MELCO (including contract and temporary employees) and 52,596 from 71 Japanese affiliates.

In conjunction with World Human Rights Day, MELCO deployed Human Rights Day awareness materials to all Mitsubishi Electric Group sites and affiliate companies in Japan and overseas to raise awareness of human rights among all Group employees and to spread awareness of the materiality "Respect all people".

## **10. Effectiveness of Assurance that Forced Labour and Child Labour are Not Used in Operations and Supply Chains**

The Mitsubishi Electric Group currently uses the following process to assess the risk of human rights violations, including child labor and forced labor, within the Group and its suppliers to ensure the accuracy and objectivity of the results:

### **(A) Within the Mitsubishi Electric Group**

(i) MELCO will periodically conduct human rights impact assessments with the support of an external human rights specialist organization to objectively evaluate the Group's efforts to respect human rights and implement continuous improvement activities based on the results.

### **(B) To Mitsubishi Electric Group Suppliers**

(i) The Group requests suppliers sign a form confirming their agreement to the "Mitsubishi Electric Group Supply Chain Code of Conduct" and to respond to a survey form (RBA-SAQ) to confirm that there is no risk of human rights violations, including forced labour and child labour, in our supply chain. We believe that by utilizing the tools of the RBA, which are international standards, we can better ensure effectiveness.

[Attestation Page Follows]



In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

By: John Fowler

Name: John Fowler

Title: VP & CFO, Treasurer, Secretary, Director

Date: 5/31/2024