

**Subject: Fighting Against Forced Labour and Child Labour in Supply Chains Act FY 2024 Statement**

**Company Name:** Mitsubishi Electric Automation, Inc. (“MEAU”)

**Effective Date:** May 31, 2025

**Next Review:** May 2026

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**1. MEAU’s Commitment to Fighting Against Forced Labour and Child Labour (FY 2024)**

This is MEAU’s updated 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 MEAU, a member of the Mitsubishi Electric family of companies (the “Mitsubishi Electric Group” or “Group”).

This statement outlines the steps MEAU and the Mitsubishi Electric Group have taken through FY2024, 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 FY2024 refers to the period from April 1, 2024 to March 31, 2025.

**2. Basic Information on MEAU**

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

MEAU serves a wide variety of industrial markets within North, Central and South America with a family of automation products including programmable logic controllers, variable frequency drives, operator interfaces, motion control systems, computer numerical controls, industrial robots, and servo amplifiers and motors.

Approximately 5.9% of MEAU sales are to customers located in Canada. The remaining 94.1% of MEAU's sales are to customers located in the United States and Central and South America.

MEAU has approximately 443 employees, most of whom are located in the United States. MEAU employs around 10 employees in Canada.

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

The Mitsubishi Electric Group promotes continuous improvement activities based on the PDCA cycle 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 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 FY2024, 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 10 times.

MEAU has established a Legal Compliance Committee to work with all MEAU 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 Legal Compliance Committee meets 2 times each year to review the company's overall compliance program and consists of all members of MEAU's 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.

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.

As a member of the Mitsubishi Electric Group, MEAU adheres to the Group Code of Conduct, which provides:

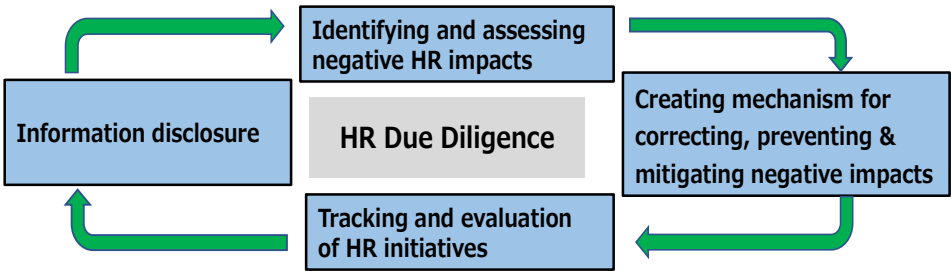
***Respect for Human Rights:***

- 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.*

Additionally, in connection with its United States Customs Trade Partnership Against Terrorism ("CTPAT") certification, in June of 2023, MEAU adopted its CTPAT Social Compliance Foreign Supplier Code of Conduct (the "Code"). This Code emphasizes MEAU's recognition of the importance of human rights and its commitment to standards of legal compliance and ethical business conduct as it relates to MEAU's procurement of goods and services. The Code provides that MEAU will not partner with any business that uses forced labour and that MEAU will participate in the execution of forced labour prohibition laws and government policies in the MEAU supply chain. Under the Code, foreign suppliers are expected to protect internationally proclaimed human rights in their operations and for their employees, and to not directly or indirectly use forced labor, or inputs produced using such labor.

**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.



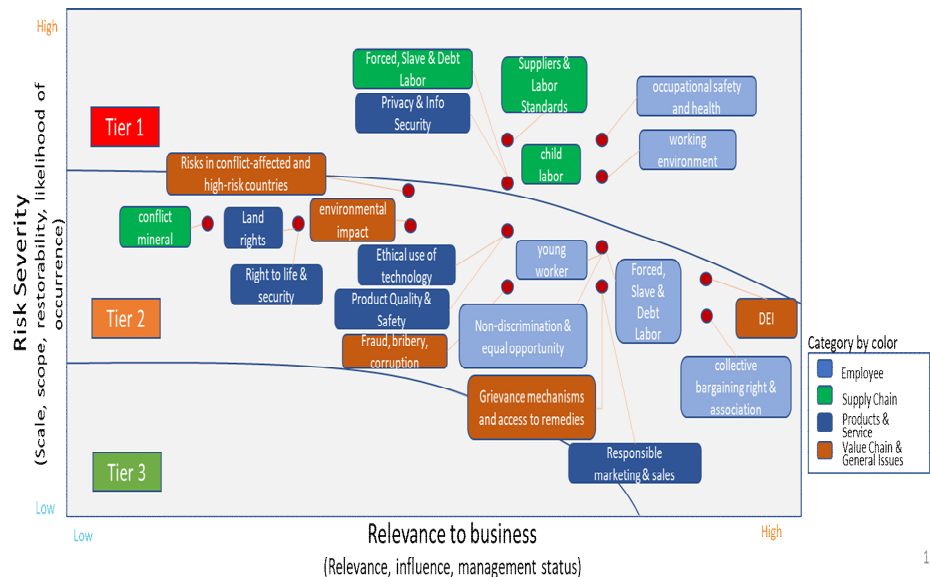
Activities at each step of the Mitsubishi Electric Group’s human rights due diligence:

(A) Identifying and assessing negative human right impacts

(i) Human Rights Impact Assessment

In FY2023, MELCO conducted a 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 eighty- six (86) recommendations for the Mitsubishi Electric Group's corporate activities (including supply chain).

The breakdown of BSR’s recommendations is as follows: eighteen (18) for management systems (including the establishment of a human rights promotion system), seventeen (17) for employee rights, nineteen (19) for supply chain rights, sixteen (16) for product services and human rights, and sixteen (16) for other cross-cutting issues (including improvements to the grievance mechanism).



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

(i) For the eighty-six (86) items recommended by BSR in the Human Rights Impact Assessment 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. As of the end of FY2024, MELCO confirmed that 53.5% of the eighty-six (86) recommendations had been implemented by checking the status of initiatives in each department. As some of the improvements, by their nature, will take a long time to implement, MELCO has established a KPI of achieving 100% implementation of improvements by the end of FY2026, and will check the status of implementation at the end of FY2025 and FY2026, and take follow-up action as necessary. (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 will annually check the status of improvement implementation for the eighty-six (86) recommendations presented by BSR in FY2023.

(c) In addition, in order to confirm that the risk of forced labour, child labour, etc. is being reduced at all sixteen (16) of the Mitsubishi Electric Group's manufacturing sites in Japan, MELCO implemented the RBA's Self Assessment Questionnaire (RBA-SAQ) in FY2024. Results of the RBA-SAQ confirmed that all sixteen (16) sites were of medium risk and that there was no use of forced labour or child labour. From FY2025 onwards, the RBA-SAQ will be conducted annually at the same sixteen (16) sites, and will be expanded to include Group companies in Japan and overseas.

(ii) Tracking and evaluation in the supply chain

(a) Commencing in FY2024, the Mitsubishi Electric Group began checking the status of human rights initiatives in the supply chain using the newly established Mitsubishi Electric Group Supply Chain Code of Conduct and the RBA-SAQ. In FY2024, the Group distributed the Mitsubishi Electric Group Supply Chain Code of Conduct to approximately 5,000 companies and obtained confirmation of agreement from suppliers accounting for 88% of the Group's purchases. The Group also requested that approximately 500 suppliers in Japan complete the RBA-SAQ and received responses from 50% of them. No cases of forced labour or child labour were confirmed at any of the suppliers providing a response. From FY2025 onwards, the Mitsubishi Electric Group will continue to work to achieve 100% agreement of its suppliers with the Mitsubishi Electric Group Supply Chain Code of Conduct. The Group will also expand the scope of RBA-SAQ implementation requests to suppliers outside Japan and continue to engage in dialogue with suppliers to improve the rate of RBA-SAQ responses. MELCO will conduct RBA-SAQ checks every year. (please refer to Sections 7 & 8 for details)

(D) Information disclosure

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

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<sup>1</sup> [https://www.mitsubishielectric.com/en/investors/library/integrated\\_report/index.html](https://www.mitsubishielectric.com/en/investors/library/integrated_report/index.html)

## 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:

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, MEAU 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 MEAU has received any reports of forced labour or child labour through the multiple contact points they have established.

## 7. Supply Chain

MEAU's major supplier of goods is its parent company, MELCO. MEAU also procures goods from other Mitsubishi Electric Group companies. Goods sourced from MELCO and other Mitsubishi Electric Group companies account for 81% of MEAU's purchases.

The remaining 19% of the goods MEAU sources come from local suppliers.

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

The Mitsubishi Electric Group is continuously working to identify suppliers that are at high risk of forced labour, hazardous labour, and child labour through gathering responses to the RBA-SAQ survey form, which is sent to the top 80% of suppliers in terms of purchasing value each year. In FY2024, the RBA-SAQ was rolled out to domestic suppliers in Japan, and from FY2025 onwards, the scope of the RBA-SAQ will be expanded to include overseas suppliers. If we do identify a risk, we continuously seek to correct it through dialogue with the supplier. In the latest survey in FY2024, 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 expectations of suppliers and are in the process of confirming this in the RBA-SAQ.

### (B) 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>2</sup> and EMRT<sup>3</sup>) that are commonly used in the automobile, electric, and electronic industries. In FY2024, surveys were carried out on 1,036 suppliers, and responses in survey form were obtained from 916. As a result of the survey, 368 smelters were identified. Of the identified smelters, 233 were RMAP<sup>4</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 conducted in FY2023. For human rights violation risks identified in the Human Rights Impact Assessment, MELCO has 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 the Mitsubishi Electric Group Supply Chain Code of Conduct, which is based on the RBA Code of Conduct.
- (iii) We confirm the risk of forced labour and child labour at our suppliers using the RBA-SAQ and request improvements based on the evaluation results.
- (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.

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

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<sup>2</sup> Conflict Minerals (tin, tantalum, tungsten, and gold) – reporting template issued by The Responsible Minerals Initiative

<sup>3</sup> Cobalt and Mica – reporting template issued by The Responsible Minerals Initiative

<sup>4</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.

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 FY2024 was 41,882 from MELCO (including contract and temporary employees) and 21,508 from 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."

In addition, MEAU provides an annual in-house prepared training course to its procurement personnel that includes forced labour and child labour issues.

**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.

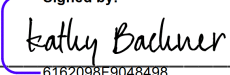
**(B) To Mitsubishi Electric Group Suppliers**

(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.

Signed by:  
  
6162098F9048498...  
By: \_\_\_\_\_  
Name: Kathy Bachner  
Title: VP of HR and Administration  
Date: 5/29/2025