Occupational Health and Safety

Management Message

The MC Group has a global workforce of approximately 77,000 professionals. These people are MC’s greatest assets. ‘Fostering Our Employees Maximum Potential’ has been identified as one of the seven Key Sustainability Issues for MC to address together with our Group companies, and as our operations continue to expand and globalize, diverse human resources representing all genders, nationalities and other characteristics will be needed to fully utilize their respective capabilities in order for the MC Group to continue generating corporate value sustainably. With this in mind, we believe that maintaining and promoting health is an important issue, starting with the provision of safe working environments.

The MC Group promotes initiatives around occupational health and safety (OHS) and health management, which are flexibly tailored to the independence and capacity of each individual and organization. These include activities to create environments where employees and contractors can work with peace of mind, as well as health, labor and crisis management initiatives. We aim to build and operate management systems that go beyond simply meeting the legal requirements in the countries where we operate to provide support that is more substantial.

Within the MC Group, there are companies with OHS management systems that have obtained the international certifications ISO45000 and OHSAS18001. Furthermore, in order to promote OHS management throughout the entire MC Group, we will develop an organizational framework, clarify responsibilities and continuously monitor progress in order to refine, maintain and further improve our activities.

Accordingly, we have set out the following policy for the MC Group:

**MC Group Occupational Health and Safety (OHS) Policy**

- We will promote the strengthening of systems for employee health and occupational health and safety (OHS) for the entire MC Group.
- We will conduct robust OHS management regardless of the country or region where we operate, upholding and seeking to go beyond local labor standards, laws and regulations.
- We will reduce the risk of infectious diseases for our employees as well as maintain and improve their health, with the aim of creating an environment where our people, the MC Group’s greatest asset, can work with peace of mind.
- Through proper management systems, we will prevent occupational accidents at each workplace. In the event an accident does occur, we will quickly assess the situation, analyze the cause and formulate preventative measures.

**Fostering Our Employees’ Maximum Potential and Reducing Health Risks**

MC has designated “Fostering Our Employees’ Maximum Potential,” as one of its Key Sustainability Issues (Materiality).

Our policies on occupational health and safety are designed to enable diverse human resources to make full use of their capabilities and approach their work with enthusiasm.

MC is placing maximum emphasis on employee health by aiming to reduce the risk of employee illness. We place particular focus on mental health, providing a counseling desk and mental health support desk staffed by clinical psychotherapists as well as a dedicated physician at the in-house medical clinic. Furthermore, MC conducts a regular online stress check. For workers’ safety, we respond rapidly in the event of an accident and continue to raise awareness about safety and establishing and improving our management systems.
Supply Chain Initiatives

Recognizing the importance of managing environmental and social impacts in its supply chains, MC has established the Mitsubishi Corporation Policy for Sustainable Supply Chain Management (as amended in August 2018). The policy requires suppliers to respect human rights and endeavor to provide their employees with safe and healthy work environments. In addition to sharing the policy with suppliers, MC conducts a regular questionnaire to confirm compliance with it.

While basic measures for occupational health and safety management are undertaken by each business, the MC Group endeavors to address this issue collectively. Measures include visiting suppliers to confirm the status of their activities when determined that site visits are necessary considering location as well as the type of business.

* Covers only Tier 1 suppliers in Japan and abroad

Reference: For details on other supply chain initiatives other than those described above, please see Supply Chain Management on page 127–131.

Policy to Proactively Address Global Health Issues (such as HIV/AIDS, Tuberculosis, Malaria)

MC is actively conducting business globally with a business network spanning more than 200 countries around the world. For some of these countries, health issues such as HIV/AIDS, tuberculosis and malaria are pressing issues. MC’s policy is to work proactively to address these global health issues. One example of how MC is addressing the health problems of HIV/AIDS and malaria through its investee companies is through the initiatives of Mozal, an MC Group aluminum smelting company in Mozambique.

Mozal has been placing great emphasis on social contribution activities. Through an annual contribution of approximately ¥200 million in funding, Mozal conducts activities such as helping small businesses to create jobs, putting in place mechanisms to support education and public health, and providing health education. Support activities are also undertaken in other areas such as sports, culture and social infrastructure. Specific examples of support for education and health education include the construction of schools and anti-malaria clinics as well as the provision of HIV education.

Reference: Please also refer to page 121 for Mozal’s ESG initiatives.

Targets

**MC Group**

- Health check-up rate for domestic (Japan-based) employees: 100%
- Zero fatalities (including contractors)
- Reduction in the rate of workplace accidents from the previous year (including contractors)

Reference: For details on performance related to the targets above, please see Performance Data on pages 100–101.

**MC**

- Health check-up rate for overseas assignees: 100%
- Percentage of annual paid leave taken: 70%
- Zero workplace accidents
MC has appointed the Member of the Board, Executive Vice President, Corporate Functional Officer for Human Resources as the chief officer in charge of OHS management for the MC Group, and promotes a structure where the Global Human Resources Department coordinates each of the Business Groups, which are primarily responsible for OHS management.

For each MC Group company in Japan, we have established committees such as the Health Committee in line with the Industrial Safety and Health Act, in which employees also participate in developing, evaluating and determining plans related to preventing health problems as well as maintaining and promoting good health.

Reference: Diagram of the Sustainability Promotion Framework (P.09)

MC considers occupational health and safety as a key management priority, and has been working to pursue health and productivity management. Once a month, MC convenes its Health Committee on a non-consolidated basis to address employee health and workplace safety matters. The Company’s Chief Health and Safety Supervisor (a position held concurrently by an Executive Vice President) heads the committee. Committee members include three occupational physicians and nine health supervisors.

Furthermore, information is shared by holding regular meetings attended by the Global Human Resources Dept., medical clinic and health insurance association. In addition, information is shared and policies are implemented, including mental health measures, within the Liaison Committee for domestic Group companies. In April 2018, the Health Promotion Office was established within the Global Human Resources Department. This office coordinates with related departments (e.g. the internal medical clinic, the mental health support desk) as well as MC Health Insurance Society to effectively use data and consider health initiatives. MC’s health initiatives were recognized under the 2019 Health & Productivity Management Outstanding Organizations Recognition Program’s WHITE500, a list of 500 companies recognized for excellence in their health and productivity initiatives.
Employee Participation

- Employees participate in the Health Committee which develops plans concerning the prevention of health problems and the maintenance and enhancement of good health, along with discussing evaluations and improvements.
- MC strives to create safe and healthy workplace environments in order for its diverse workforce to thrive and succeed. At the same time, MC takes steps to ensure that each employee is able to manage his or her own health independently through training seminars and related events. Notably, strong emphasis is placed on the health management of employees on overseas assignment. MC also ensures a smooth process for employees to obtain hourly paid leave when they require outpatient care, with the Group site (supervisor) coordinating each case as necessary. In addition, MC supports events such as charity marathons, which help to create opportunities for employees to develop an interest in sports and to foster an awareness of their health.
- MC conducts discussions on creating a more positive workplace. Labor-management meetings are held between the MC Staff Union and management, including the President & CEO, along with meetings to discuss business performance held twice a year and regular meetings with the Global Human Resources Dept. As part of measures to realize “New Work Styles Befitting MC,” we have put a framework in place to promote appropriate time management. To this end, we have established the Time Management Committee as a collaborative organization between labor and management. Moreover, the MC Staff Union also holds health seminars for employees.

Loan and Investment Screening

When reviewing and making decisions on loan and investment proposals, MC conducts a comprehensive screening process which considers not only economic aspects, but ESG factors as well. From an occupational health and safety perspective, particularly for projects which have a high risk of accidents or fatalities, MC ensures that numerous issues, including the maintenance status of HSE management systems, past cases of accidents or fatalities, and quantitative data such as the LTIFR (Lost Time Injury Frequency Rate) are considered in its deliberations. Besides screening new investment and exit proposals, MC also strives to make improvements to existing business investments by monitoring their management practices.

Risk Management (Risk Assessment)

Occupational health and safety is a vital component of HSE risk and is managed in accordance with the MC Group Risk Management Policy.

Excerpt:
“(1) Definition: HSE risk refers to recognizing the impact of manufacturing, industrial works, distribution and other operations on occupational health and safety as well as the environment, and identifying and managing risks related to accidents, damage to health, environmental contamination, etc.
(2) HSE risk management: a. Risk identification and management: Identify latent risks related to HSE based on the nature of the operations and sector, and avoid, mitigate and manage the risks. b. Risk awareness-raising: Raise employees’ awareness of the importance of HSE risk based on the nature of the operations and sector through education, training and other activities. c. Formation of policies related to accidents and response: Stipulate emergency policies in advance in order to be prepared in the event of an accident. Establish the necessary measures to minimize damage while working with relevant institutions when an accident occurs. Should an accident occur, conduct necessary investigations, analyze the causes, and implement measures to prevent future reoccurrence.
(3) System: Comply with laws and regulations, international rules, voluntary industry standards, and customer requirements related to HSE and formulate an action plan based on the company’s industry and business activities. In addition, formulate policies based on the action plan and introduce a system for regularly confirming their implementation. Further, monitor performance related to HSE and review the action plan.”

Reporting of Workplace Accidents

The MC Group strives to prevent workplace accidents for employees. In the event that a workplace accident occurs in an MC Group company, MC has established a reporting framework that utilizes compliance reporting lines and other means with the aim of appropriately responding (by conducting investigations, addressing findings, etc.) and promptly implementing measures to prevent reoccurrence.

Reference: For details on the compliance reporting lines above, please see Compliance Framework on page 163.
Crisis Management Initiatives

MC has operations in approximately 90 countries around the world, with a global workforce of roughly 77,000 professionals. The company recognizes the ever-present danger that somewhere in the world, its employees or their families may be the victims of natural disasters, regional conflicts, terrorist attacks or other incidents.

Accordingly, MC always tries to prepare for the unexpected. Should an incident occur, the Company is capable of setting up its Crisis Management Headquarters at a moment’s notice. The headquarters functions as a hub for gathering relevant information and issuing directives on crisis response. MC has compiled a manual explaining how to prepare for and what to do in the event of a crisis. It also outlines the company’s basic thinking and actions. Simulations and drills are also regularly held to ensure that all employees are prepared, especially prior to overseas assignments.

When the Great East Japan Earthquake struck on March 11, 2011, MC was quick to activate the Crisis Management Headquarters. All members of company management and employees were confirmed safe that same evening, and arrangements were made to ensure that those who were unable to return home would be safe for the night. In the days that followed, the task force swiftly set up a flexible work schedule in response to the rolling blackouts, furnished financial assistance to employees affected by the disaster, and provided other support.

MC has also incorporated crisis and health management sessions in its various training programs in order to raise awareness of those issues. Furthermore, the Health Committee, which is headed by the Chief Health and Safety Supervisor (a position held concurrently by an Executive Vice President) and made up of occupational physicians (medical clinic directors) and Group health supervisors, is involved not only in employee health management but also keeping abreast of emerging infectious diseases and the timely, accurate disclosure of information.

Health Management of Employees and Their Families During Overseas Assignments

There are approximately 1,300 MC head-office employees on overseas assignments at any given time, and some 1,600 family members accompanying them. Recognizing that working overseas for extended periods can have an impact on one’s health due to differences in language, culture, medical systems, and other environmental factors, MC has taken several steps to ensure that its employees and their family members remain in good health wherever they happen to be. In addition to facilitating annual local health examinations, the MC Head Office medical clinic is equipped to handle health-related inquiries from employees and their family members should they feel unwell while overseas. If there is not a suitable medical facility in the area, MC will provide for the employee and their family to either return to Japan or travel to other nearby developed country for the examination. Employees and their families also qualify for subsidized travel expenses when taking Health Maintenance Leave, which can be taken in addition to paid holidays when employees need time off to refresh themselves, both in mind and body. MC also provides a global, 24-hour Japanese language service for medical emergencies, emergency assistance in transporting employees to more medically advanced regions like Tokyo, Singapore, and Bangkok and other extensive health-related support for its employees on overseas assignments.

Survey to Monitor and Improve the Health and Working Environments of Employees on Overseas Assignments

In order to drive continuous improvement, since 2013 the Global Human Resources Dept. has conducted a survey targeting employees on overseas assignments to assess the quality of healthcare they receive as well as their working conditions in general for the purpose of further enhancing health-related measures.

Additional support is provided by the Global Human Resources Dept. or the Mental Health Support Desk to employees who exceed a certain number of points in connection with working conditions and stress levels.
Medical Clinics for Employee Health Management

Central to MC’s employee health management are medical clinics at its Head Office and Kansai and Chubu Branch Offices for MC employees and those on domestic and overseas assignments.

The MC Head Office clinic serves around 25,000 total users per year. Its medical departments include internal medicine, ophthalmology, dermatology, otolaryngology, orthopedics and neurology departments, as well as a diagnostic center. The clinic is staffed with approximately 50 full- and part-time medical professionals, including the clinic director, physicians, nurses, testing and radiology technicians, nutritionists and pharmacists. Employees can visit specialist physicians to receive medical consultations and treatment.

The clinics offer both regular checkups and special examinations. The attendance rate for regular checkups in Japan is 100%. After a checkup, employees who require follow-up examinations can return after three months and six months. Nearly 100% of these employees attend follow-up examinations. In particular, chest X-rays are used to check for and treat tuberculosis at an early stage in order to prevent infections from spreading.

Reference: For details on performance, please see Head Office Clinic Usage on page 101.

Preventing Lifestyle-Related Diseases and Metabolic Syndrome

MC’s health clinics provide early check-ups and treatment and offer medium and long-term health management in conjunction with health examinations. Special examinations are offered to employees aged 40 and over and are utilized by 89% of employees in this age group. Preventing lifestyle-related diseases such as dyslipidemia, diabetes and hyperuricemia is a pressing societal issue. MC is working to prevent lifestyle-related diseases and metabolic syndrome for employees by providing access to physicians and nutritionists via the clinics.

Early action is essential to preventing lifestyle-related diseases. Going forward, in addition to providing health guidance for younger employees, MC will work to raise the awareness of healthy employees with normal checkup results on how to structure their lifestyles for maintaining their health.

Mental Health Measures

Focusing on preventive measures and early treatment, MC provides extensive mental care support. The company has a simple, web-based system through which employees can assess their own stress levels and propensities to develop health problems. MC also conducts various types of training for employees, including managers, in an effort to prevent mental health issues. Since the fiscal year ended March 2017, MC has made it a requirement for all employees in Japan, including secondees, to complete the self check. After answering an online survey, employees immediately receive a three-stage evaluation of their stress levels. If their stress levels are particularly high, they are instructed to make an appointment with a neurologist at one of the company’s clinics. If necessary, working environment adjustments are also prescribed to help bring their stress levels down.

Meanwhile, MC’s internal Mental Health Support Desk and medical clinic neurology department are equipped to quickly accommodate employee (including employees on domestic and overseas assignments) health inquiries, with a system that supports employees together with their workplaces. MC has also set up an outside help desk that is linked to its specialized EAP** medical facilities. Through this comprehensive system, employees and their family members can consult with health-care professionals or receive counseling at any hour of the day, whether in person or by telephone or e-mail.

Moreover, a summary of the results are shared on an anonymous basis within the Company and utilized to improve working styles and workplace conditions. Going forward, MC plans to make use of the survey findings to inform its mental health issue prevention measures for employees, as well as training and other measures to further raise awareness of mental health issues.

** Employee Assistance Program

<Mental Health Support Desk>
The Mental Health Support Desk has been established for MC employees (including those on domestic and overseas assignments). The Support Desk is available to employees for mental health consultations. It helps employees to check their stress levels and enables those feeling unwell to have an initial consultation before seeing a neurologist. It also supports employees who have been on extended leave due to psychiatric issues to return to work by offering rehabilitation programs, recommendations on workplace re-integration and long-term follow-up.
Assistance with Fees for Multiphasic Health Screenings

Multiphasic health screenings are offered to employees in line with the Japanese Industrial Safety and Health Act, the fees for which are partially subsidized*.

* Subsidized by the MC Health Insurance Society

Measures for Infectious Diseases

MC looks to the Japanese Ministry of Foreign Affairs, the World Health Organization and other organizations for the latest information on the outbreak and spread of infectious diseases overseas and responds accordingly. Employees assigned overseas receive health examinations before their departure. Furthermore, these employees and their families receive advice on vaccinations required for their assignment location as well as general health management support.

MC takes a thorough approach towards preventing the spread of diseases in the workplace through initiatives such as providing anti-malaria vaccination for employees traveling on business trips to regions where tropical malaria is prevalent, recommending antibody tests and vaccinations against measles and rubella (MR) which has recently become increasingly prevalent in Japan, and administering in-house vaccinations against seasonal influenza.

Tuberculosis Prevention Initiatives (Mongolia)

MC partnered with the Mongolian Anti-Tuberculosis Association to raise awareness of tuberculosis in Mongolia’s capital Ulaanbaatar. Targeting particularly high-risk groups such as college students, MC aimed to raise awareness of the disease through pamphlet distribution, videos and events. In addition, for secondary school students, MC organized a drawing contest and used the winning entries in advertising posters. These awareness-raising activities were conducted at five universities and 750 secondary schools.

New Work Styles Befitting MC

As business becomes ever more complex and fast-paced, the pressure on employees to carry out more work at a higher quality inevitably increases. In addition, working for a sogo shosha means it can often be difficult to avoid busy and high-pressure periods such as with large projects and overseas deals. For this reason, MC places particular priority on: 1) the mental and physical health of employees; 2) compliance with laws, regulations and rules; and 3) appropriate management of extended overtime.

Specifically, MC goes beyond legal requirements in terms of managing overtime hours for non-managers and time spent in the office for managers. When employees exceed a certain level of overtime hours, they must submit a health questionnaire and receive health guidance from an occupational physician. Furthermore, MC accurately reports overtime hours and complies with the Japanese Article 36 Agreement as a matter of course, and also conducts time management training and other initiatives for managers.

While taking into account the differences between specific business environments and industries, MC aims to achieve an average annual paid leave utilization rate of 70% or more, and systematically encourages employees to utilize their annual paid leave. In addition, where certain departments demonstrate a tendency to work overtime frequently, the Company will require departments to introduce improvement measures and efficiency practices. As a result, in the fiscal year ended March 2019, the annual paid leave utilization rate was 67% while average monthly overtime was 25.7 hours/month.

Through such measures, MC is creating a working environment that enables its diverse workforce to thrive professionally while fostering an organizational culture in which performance is evaluated fairly based on results.
Initiatives on a Consolidated Basis

Initiatives at Group Companies

MC Group companies conduct activities to prevent industrial accidents by formulating response policies, introducing occupational health and safety management systems for employees, and taking other appropriate measures based on the nature of the business and context.

1) Initiatives of Mitsubishi Corporation Exploration Co., Ltd. (MCX)

As a company which conducts energy resource projects with a focus on natural gas and LNG, MCX regards HSE as a top priority. The company believes that proper management of HSE risks is crucial in order to contribute to the sustainable development of society, and accordingly, announced a variety of initiatives in line with the MCX HSE Policy. Based on this policy, MCX set up its HSE Office under the direct administration of the CEO. MCX will continue to revise and improve its HSE Management System (HSEMS) and to announced HSE activities companywide with the aim of preventing pollution and accidents, reducing environmental impact and mitigating occupational health and safety risks.

Reference: Mitsubishi Corporation Exploration’s HSE initiatives

2) Mitsubishi Development Pty Ltd. (MDP)

MDP manages metallurgical coal mines and regards occupational health and safety as a top priority in its management strategy. The company gives full consideration to workers’ safety in its operations.

3) Donggi-Senoro LNG Project

MC is one of the largest shareholders of the Donggi-Senoro LNG Project in Indonesia (DSLNG).

There are various safety and operational risks associated with the processing and production of Liquefied Natural Gas (LNG) from sweet natural feed gas. DSLNG recognizes this and considers process safety and occupational health and safety to be of utmost importance. To ensure the safety of workers, DSLNG has implemented a range of measures, including formulating policies on integrated quality, health, safety, environment and security along with establishing a Process Safety Management Committee. In addition, DSLNG also provides employees with training on matters such as Permit to Work, process safety management, crisis management and firefighting measures. Moreover, the company has established a robust framework for conducting regular reviews and improvements on safety.

(1) Implementation of Audits:
DSLNG conducts Permit to Work Audits and Safety Leadership Conversations (SLC) on a daily basis. Through these audits, checks are conducted on various aspects related to onsite safety, along with ensuring that Permit to Work entries are recorded accurately. In the event that any issues are identified, DSLNG ensures that they are followed up on, and operations are immediately suspended should a safety issue arise.

(2) Examples of Risk Assessments:
A Job Hazard Analysis (JHA) is conducted for the majority of jobs to scope out potential risks, assess their severity, identify possible measures to manage the risks, and determine the overall level of risk. Through this process DSLNG ensures that jobs are performed in line with adequate safety standards.

4) MC Ferticom Co., Ltd.

As its core safety initiative, MC Ferticom Co., Ltd. implements S-I-GMA (sigma) activities with the aim of improving manufacturing operations.

S = Safety
I = Improvement
GMA= Good Manners

Through these activities, the company is making a concerted effort to raise awareness of safety and improve manufacturing operations. MC Ferticom Co., Ltd. has acquired the OHSAS 18001 occupational health and safety certification at all of its facilities, namely four plants and one manufacturing center. As a responsible fertilizer manufacturer, the company will continue to pursue further safety and reliability.

Reference: MC Ferticom Co., Ltd. website (Japanese only)
https://www.mcferticom.jp/company/csr/#csrMenu
**Status of Acquisition of OHSAS 18001**

**Main MC Group Companies with OHSAS Certification**

<table>
<thead>
<tr>
<th>Business Group</th>
<th>Name of Company</th>
<th>Business Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Gas Group</td>
<td>Tomori E&amp;P Limited</td>
<td>Natural gas / condensate development and production</td>
</tr>
<tr>
<td>Industrial Materials Group</td>
<td>MC Zhenjiang Anode Solutions Co., Ltd.</td>
<td>Production and sale of anodes for aluminum smelting</td>
</tr>
<tr>
<td></td>
<td>UBE-MC Hydrogen Peroxide Ltd.</td>
<td>Production and sales of hydrogen peroxide</td>
</tr>
<tr>
<td></td>
<td>Cape Flatley Silica Mines Pty. Ltd.</td>
<td>Mining, refinery and sales of silica sand</td>
</tr>
<tr>
<td>Petroleum &amp; Chemicals Group</td>
<td>MC Ferticom Co., Ltd.</td>
<td>Fertilizer production</td>
</tr>
<tr>
<td>Mineral Resources Group</td>
<td>Anglo American Sur S.A.</td>
<td>Copper ore mining, processing and sales</td>
</tr>
<tr>
<td></td>
<td>Compagnia Minera Del Pacifico S.A.</td>
<td>Iron ore mining, processing and sales</td>
</tr>
<tr>
<td>Industrial Infrastructure Group</td>
<td>Chiyoda Corporation</td>
<td>Plant engineering business</td>
</tr>
<tr>
<td></td>
<td>Mitsubishi Electric de Colombia Ltda.</td>
<td>Elevator business (sales and maintenance)</td>
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<tr>
<td></td>
<td>Mitsubishi Elevator Malaysia SDN. BHD.</td>
<td>Elevator business (sales and maintenance)</td>
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<td>Mitsubishi Elevator (Singapore) Pte. Ltd.</td>
<td>Elevator business (sales and maintenance)</td>
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<td></td>
<td>Mitsubishi Elevator Hong Kong Company Limited</td>
<td>Elevator business (sales and maintenance)</td>
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<tr>
<td></td>
<td>Mitsubishi Elevator (Thailand) Co., Ltd.</td>
<td>Elevator business (sales and maintenance)</td>
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<tr>
<td>Automotive &amp; Mobility Group</td>
<td>PT Mitsubishi Motors Krama Yudha Indonesia</td>
<td>Automobile manufacturing</td>
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<tr>
<td></td>
<td>PT. Kansai Paint Indonesia</td>
<td>Automobile paint production and sales</td>
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<tr>
<td>Food Industry Group</td>
<td>Deccan Fine Chemicals (India) Private Limited</td>
<td>Contracted manufacturing of agrochemical intermediates and active ingredients</td>
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<td></td>
<td>Cermaq Group AS</td>
<td>Salmon farming business</td>
</tr>
<tr>
<td></td>
<td>Princes Limited</td>
<td>Food and beverage production</td>
</tr>
<tr>
<td></td>
<td>Olam International Limited</td>
<td>Agricultural production, collection, processing, trade, port operation</td>
</tr>
</tbody>
</table>

**Provision of HSE Information**

NIKKEN CORPORATION

Since 2002, Nikken has a regularly-published newsletter called Safety News (in Japanese), which is shared with customers and other stakeholders. The company gathers a range of information including recommendations on how to reduce labor-related accidents as well as methods for how to avoid and prevent HSE incidents based on white papers published by related organizations.

Reference:  NIKKEN CORPORATION Safety News (Japanese only)
https://www.rental.co.jp/topics/index_safetynews.html
### Performance Data

#### Occupational Accident Data

#### Occupational Health and Safety Data (Non-Consolidated)

<table>
<thead>
<tr>
<th></th>
<th>2017.3</th>
<th>2018.3</th>
<th>2019.3</th>
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<tbody>
<tr>
<td>Lost time injuries frequency rate*</td>
<td>0.45</td>
<td>0.46</td>
<td>0.47*</td>
</tr>
<tr>
<td>(Frequency rate of injuries)</td>
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<tr>
<td>Lost time injuries severity rate*</td>
<td>0.00</td>
<td>0.01</td>
<td>0.00*</td>
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<tr>
<td>(Severity level of accidents)</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Occupational illness frequency rate*</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00*</td>
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<tr>
<td>(Frequency of industrial accidents classified as work-related illnesses as stipulated by the Japanese Ministry of Health, Labour and Welfare (including fatalities caused by illness))</td>
<td></td>
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</tr>
</tbody>
</table>

* Calculated based on the standards of the Japanese Ministry of Health, Labour and Welfare for employees working at head offices and domestic branches (excluding advisors and contract employees).

• “Frequency rate” refers to the frequency of workplace accidents and is derived from the number of injuries/deaths resulting from workplace accidents per 1,000,000 actual working hours.

• “Injuries/deaths” refers to workplace accidents resulting in both physical injury or loss of physical function as well as one or more days of absence from work.

• “Severity rate” refers to the severity level of accidents and represents the total number of lost time injury days / 1,000 total actual working hours.

• There have been no fatal accidents at MC during the three-year period stated above.

#### Comparison with Industry Average (for Wholesalers and Retailers with a Business Scale of 100 Employees or More)

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
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<tbody>
<tr>
<td>Lost time injuries frequency rate</td>
<td>1.74</td>
<td>1.94</td>
<td>1.83</td>
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<tr>
<td>Workplace accident severity rate</td>
<td>0.03</td>
<td>0.10</td>
<td>0.09</td>
</tr>
</tbody>
</table>

* From the Japanese Ministry of Health, Labour and Welfare’s “2018 Survey on Industrial Accidents”
Other Data

Head Office Clinic Usage

| Patients in the fiscal year ended March 2018: (total no. of people) | Approximately 24,800 people per year (Medical examinations 6,700; general medical examinations 16,600; overseas medical consultations, health guidance and others 1,500) |

Health Checkup Results

<table>
<thead>
<tr>
<th>2017.3</th>
<th>2018.3</th>
<th>2019.3</th>
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<tbody>
<tr>
<td>Overseas assignees checkup rate</td>
<td>85%</td>
<td>91%</td>
</tr>
</tbody>
</table>

Stress Check Results (Domestic)

<table>
<thead>
<tr>
<th>2017.3</th>
<th>2018.3</th>
<th>2019.3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Checkup rate</td>
<td>95%</td>
<td>95%</td>
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</table>

Training and Education Performance

<table>
<thead>
<tr>
<th>Training course title</th>
<th>Theme</th>
<th>Scope</th>
<th>Participants (2017.3)</th>
<th>Participants (2018.3)</th>
<th>Participants (2019.3)</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) New upper-level manager seminar</td>
<td>Medical clinic director lectures on safety and health management</td>
<td>General Manager level</td>
<td>56</td>
<td>50</td>
<td>66</td>
</tr>
<tr>
<td>(2) Organizational management training</td>
<td>Medical clinic director lectures on safety and health management</td>
<td>Manager level</td>
<td>101</td>
<td>138</td>
<td>103</td>
</tr>
<tr>
<td>(3) Intermediate follow-up training for new employees</td>
<td>Lecture on stress management</td>
<td>University graduate employees</td>
<td>194</td>
<td>178</td>
<td>153</td>
</tr>
<tr>
<td>(4) Integration training for mid-career hires</td>
<td>Lecture on stress management</td>
<td>Mid-career hires</td>
<td>16</td>
<td>6</td>
<td>10</td>
</tr>
<tr>
<td>(5) Instructor training</td>
<td>Lecture on workplace mental health</td>
<td>“Instructor” employees</td>
<td>154</td>
<td>195</td>
<td>184</td>
</tr>
<tr>
<td>(6) Domestic assignment orientation</td>
<td>Mental health included as theme in lecture on human resources management. Lecture delivered by legal advisor.</td>
<td>Managers sites/ companies</td>
<td>195</td>
<td>221</td>
<td>190</td>
</tr>
</tbody>
</table>

Independent Practitioner’s Assurance

ESG Data marked with an asterisk (*) for the year ended March 2020 has received independent practitioner’s assurance from Deloitte Tohmatsu Sustainability Co., Ltd.

Reference: Independent Practitioner’s Assurance Report (P175)