ESG DATA BOOK 2018



Social

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Editorial Policy

Editorial Policy (About this ESG Data Book)

Mitsubishi Corporation (MC) has established *Midterm Corporate Strategy 2021—Achieving Growth Through Business Management Model.* Guided by this strategy, MC pursues growth through a business model predicated on the simultaneous generation of three kinds of value through our businesses: economic value, societal value, and environmental value. Until now, we have issued publications such as our Integrated Report, which combines information that is particularly relevant to the realization of this triple-value growth. The Integrated Report details our initiatives for maximizing corporate value, along with our initiatives to steadily develop new pillars of future growth. In addition to publications such as this, MC publishes the ESG Data Book with the aim of centralizing and further enhancing the ESG-related information it discloses separately through such channels as the Integrated Report and the corporate website. Positioned as a tool to complement these other disclosures, the ESG Data Book reports more detailed ESG-related information and is primarily aimed at stakeholders who have a strong interest in ESG investment. Referring to multiple ESG reporting guidelines, it has been organized according to ESG topic for easier reference. Looking ahead, we will continue to ensure that our ESG Data Book serves as an effective communication tool which contributes to constructive stakeholder dialogue. To do so, we will strive to improve the clarity of our reporting based on the valued feedback we receive from our stakeholders.

Philosophy and Approach Related to Sustainability

Philosophy and Approach

The Three Corporate Principles

Contributing to Society through Business Firmly Rooted in Principles of Integrity and Fairness

The Three Corporate Principles—Corporate Responsibility to Society, Integrity and Fairness, and Global Understanding Through Business have served as MC's core philosophy since the Company's inception, inspiring us to conduct fair and sound business activities at all times. We have constantly endeavored to enhance our compliance initiatives. Measures have included establishing the Corporate Standards of Conduct to set forth our expectations with regard to how business should be conducted, in conjunction with developing various compliance-related internal rules, introducing a compliance officer system, and expanding and upgrading risk management frameworks.

The Mitsubishi Corporation Code of Conduct requires employees to conduct business in compliance with local laws and regulations as well as global standards such as the Universal Declaration of Human Rights established by the United Nations (UN) and the core labor standards of the International Labor Organization (ILO). It also requires employees to act in a socially responsible manner by complying with the highest ethical standards by pledging to follow the Mitsubishi Corporation Code of Conduct. The Environmental Charter and Social Charter have also been established in accordance with the Three Corporate Principles and MC will continue to increase our corporate value as a global integrated business enterprise, with the aim of contributing to the sustainable development of society.

MC Group companies share a common history and philosophy* as they continue to grow together and learn from one another.

* The Three Corporate Principles, Corporate Standards of Conduct, Code of Conduct, Environmental Charter, and Social Charter are shared with all MC Group employees globally via a portal site for MC Group companies as well as through various internal training programs.



Corporate Standards of Conduct

- 1 Aim of Corporate Business Activities Through its business activities, Mitsubishi Corporation will endeavor to increase its value. At the same time, the company will strive to enrich society in all ways, developing and offering its customers the best services and products, with the highest regard for safety.
- 2 Fairness and Integrity in Corporate Business Activities

Mitsubishi Corporation will continue to develop its business activities in compliance with all relevant laws, international regulations and internal rules. The company will act responsibly and will respect the highest social standards.

3 Respect for Human Rights and Employees Mitsubishi Corporation will respect human rights and will not engage in any discrimination. The company will preserve and improve its corporate strengths through the development of its employees, all the while respecting the character and individuality of each employee.

Information Security and Disclosure

While Mitsubishi Corporation will continue to develop, implement and improve the effectiveness of its information security management system, at the same time the company will disclose information accurately and in a timely fashion, so as to maintain transparency and be correctly understood by both its stakeholders and the general public.

5 Consideration for Environmental Issues

Mitsubishi Corporation understands that an enterprise cannot continue to prosper without consideration for its environmental performance, and will strive to protect and improve the global environment and pursue sustainable development through all aspects of its business activities.

6 Contribution to Society

As a responsible member of society, Mitsubishi Corporation will actively carry out philanthropic programs in an effort to promote the enrichment of society. Moreover, the company will support efforts of its employees to contribute to society.

Philosophy and Approach Related to Sustainability

Mitsubishi Corporation Code of Conduct

Basic Policy

All officers and employees of Mitsubishi Corporation (the "Company") must comply with all applicable laws, rules and regulations where they operate, international standards and rules, and all internal corporate rules and policies. In addition, all officers and employees of the Company must act in a socially responsible manner by complying with the highest ethical standards in the conduct of their business.

Basic Principles

- 1. Respect human rights, and do not discriminate on any basis or engage in any form of harassment.
- 2. Maintain a high regard for environmental considerations in conducting our business operations, and ensure that our business is conducted in an environmentally sustainable manner, and comply with treaties, laws and regulations concerning the environment.
- 3. Promote fair business practices and comply with trade rules, regulations, and internal corporate rules and policies.
- 4. Comply with the rules and regulations of international trade.
- 5. Protect and properly use confidential and proprietary information, protect the rights of the Company and respect the rights of others.
- 6. Do not engage in insider trading.
- 7. Avoid conflicts of interest with the Company; maintain a distinction between corporate and private business.
- 8. Record and report accounting and financial information timely and accurately.
- 9. Maintain proper legal and ethical standards with respect to gifts and entertainment.
- 10. Resolutely oppose any organization, group or individual engaged in unlawful activities and do not provide money or other types of economic benefits to them.
- 11. Promptly report to or consult the superiors, the Group Compliance Officers, the Domestic Branch Compliance Officers, the Foreign Regional Compliance Officers, the relevant departments, the Secretariat for the Compliance Committee, or the outside counsel in charge of Compliance upon discovering or committing any violations of this "Code of Conduct."

Mitsubishi Corporation Environmental Charter

At Mitsubishi Corporation we consider the Earth itself to be our most important stakeholder and are continually working towards the realization of a sustainable society through our business activities.

- We will strive to reduce greenhouse gas emissions by continually implementing new efficiency measures and embracing new technologies.
- We will promote the sustainable use of natural resources including energy, minerals, food stocks and water throughout our global business operations.
- We recognize the critical importance of what ecosystems can provide and are committed to protecting ecosystems and mitigating any potential impacts on biodiversity.
- We will strive to create and enhance environmental value through environmental conservation and environmental impact reduction measures including pollution prevention.
- We will continue to actively engage and work with our various stakeholders openly and transparently and disclose information on the environmental impacts of our business operations in an appropriate and timely manner.
- We will conduct all of our activities in compliance with environmental laws while adhering to international rules and social standards.

Mitsubishi Corporation Social Charter

Mitsubishi Corporation strives to achieve sustainable societal value though our business operations by contributing towards lasting solutions to the wide spectrum of sustainability challenges facing today's global society.

- We will work to address local societal challenges in the regions and communities in which we operate, contributing towards lasting and sustainable development through our business activities.
- We will continue our wide-ranging philanthropic commitments while regularly adapting our approach in line with ever-evolving societal needs and challenges.
- We will fully respect human rights and indigenous peoples' rights.
- We will fully respect fundamental labor rights and endeavor to ensure the provision of proper working environments with consideration for safety, health, and other aspects.
- We will not engage in corruption of any kind and will take appropriate preventative measures to safeguard against such practices.
- We will continue to actively engage and work with our various stakeholders openly and transparently and disclose information on the social impacts of our business operations in an appropriate and timely manner.

Philosophy and Approach Related to Sustainability

Simultaneously Generating Economic Value, Societal Value and Environmental Value through Our Businesses

MC conducts business activities in accordance with the Three Corporate Principles, which serve as the corporate philosophy for the entire MC Group.

MC has over 150 business units and 1,300 consolidated operating companies. This expansive network gives MC the ability to access numerous different industries on a global basis; i.e., giving us the collective capabilities needed to adopt a holistic view across numerous industries. MC believes that its core strength lies in its ability to constantly seize new business opportunities by taking full advantage of these collective capabilities.

As we maintain these collective capabilities, we will intensively allocate business resources to fields where MC is able to play leadership roles and fulfill universal societal needs such as the United Nations' Sustainable Development Goals (SDGs). By doing so, we will build the optimal business portfolio we envision by nurturing several core earnings drivers. To do so, we will need to produce highly ethical management professionals who have the foresight to identify new sources of growth and the execution skills to achieve growth.

In addition, rather than considering corporate social responsibility and businesses to be separate, we believe that it is necessary for all of the businesses MC is engaged in to simultaneously generate economic value, societal value and environmental value through their operations.

Based on this belief, in Midterm Corporate Strategy 2021, MC has reaffirmed its commitment to pursue sustainable growth through a business model predicated on the simultaneous generation of economic value, societal value and environmental value through its businesses. To this end, we have identified Key Sustainability Issues as crucial priorities for management to address.

By addressing and tackling these Key Sustainability Issues through our businesses, we will create businesses that generate value for societies as we pursue sustainable growth.



Social

Key Sustainability Issues and Promotion Framework

Key Sustainability Issues

Simultaneous generation of economic, societal, and environmental value is essential for the MC Group's growth. From this perspective, in 2016 MC identified a set of Key Sustainability Issues (Materiality) as mileposts for proactively advancing its efforts.

Through initiatives to address these Key Sustainability Issues, MC will strive to create businesses that generate value for societies.

MC has identified a set of Key Sustainability Issues as mileposts to help it proactively realize the simultaneous generation of these three kinds of value based on the nature of the MC Group's businesses. We believe that our measures to address the Key Sustainability Issues will also help to achieve the Sustainable Development Goals (SDGs)* related to each key issue. MC recognizes the role that companies are expected to play in order to achieve the SDGs. With this in mind, MC will make every effort to help make progress on the Goals.

* The SDGs are a set of 17 global goals adopted at the UN summit held in September 2015 as the core of "The 2030 Agenda for Sustainable Development."



Maximum Potential

Environmental

Key Sustainability Issues and Promotion Framework

Key Sustainability Issues (Materiality)

	Issue	Overview
***	Transitioning to a Low-carbon Society	In anticipation of the impact that climate change is expected to have on the Company's business activities, MC is working to address these potential impacts, while at the same time actively pursuing businesses that facilitate the transition to a low-carbon society and reducing greenhouse gas (GHG) emissions.
	Procuring and Supplying in a Sustainable Manner	MC will ensure the stable, sustainable procurement and supply of resources, raw materials and other inputs in line with the needs of each country around the world. In addition, we will consider environmental and social factors throughout our supply chains.
	Tackling Evolving Regional Issues	MC will continue to take appropriate steps to address geopolitical risk while at the same time contributing solutions through its business for issues faced by each country and region, thereby supporting the development of economies and societies.
	Addressing the Needs of Society through Business Innovation	MC will stay on the pulse of major industrial shifts brought about by technological advances, while continually creating innovative businesses that contribute to solutions for social issues.
A	Conserving the Natural Environment	Recognizing the Earth as our largest stakeholder, MC works to ensure the continuity of its business by preserving biodiversity, reducing its environmental impact and conserving the natural environment.
1 31	Growing Together with Local Communities	MC will contribute to regional development through its business and corporate philanthropy initiatives, and the Company will aim to grow together with the regions and communities where it operates.
	Fostering Our Employees' Maximum Potential	MC will work to develop human resources with advanced management capabilities who will become the driving force behind corporate value creation by developing career opportunities and workplaces where the members of its diverse workforce are able to grow as they share values in a spirit of mutual learning.

Identification Process for Key Sustainability Issues

Step 1	Step 2	Step 3
Creating a list of potential issues	Gauging the importance of each issue based on internal and	Identifying the Key Sustainability
In keeping with commonly used materiality setting procedures*, MC compiled a list of	external perspectives	Issues MC reexamined the selected priority issues
around 80 potential issues that should be	MC gauged the importance of each theme, in	while incorporating the views of the CSR &
taken into account in order to achieve sus- tainable growth for the MC Group, based on	terms of both opportunities and risks, and selected priority issues based on the perspec-	Environmental Affairs Advisory Committee. Following deliberations by the Executive
international standards and goals such as ISO 26000 and the SDGs	tives of the Company's business groups as well	Committee and the Board of Directors, the Key

* Referencing reporting guidelines such as those of the Global Reporting Initiative (GRI), an international NGO.

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Environmental

Key Sustainability Issues and Promotion Framework

Further Steps to Advance Sustainability

Business Group CEOs and the Corporate Functional Officer (Corporate Sustainability) regularly hold "Sustainability Dialogues" with the purpose of bolstering and expanding initiatives for addressing the seven Key Sustainable Issues formulated in the fiscal year ended March 2017. During the Sustainability Dialogues, participants discuss changes in the external environment surrounding each issue and examine how value creation by each business contributes to the overall growth of the MC Group. Additionally, ideas are exchanged on how to drive initiatives at the front lines of our business. For example, participants confirm business opportunities and risks regarding climate change, and exchange opinions on the mid to long-term strategic direction including value creation across the supply chain.

Support for the UN Global Compact

MC became a signatory to the UN Global Compact (UNGC) in 2010, and has engaged at the Participant level as of the year ending March 2019. The UNGC has laid out a set of universal principles for signatories to observe, organized into the four fields of human rights, labor standards, environment and anti-corruption. MC has declared its support for the principles, and is promoting initiatives in each field in the spirit of the Three Corporate Principles. Furthermore, MC is an executive member of the Global Compact Network Japan, which was launched as a local network in Japan in 2003. We actively participate as part of our stakeholder engagement activities aimed at understanding the external environment and fostering collaboration with other companies.

The Ten Principles of the United Nations Global Compact



Human rights	Principle 1 Principle 2	Businesses should support and respect the protection of internationally proclaimed human rights; and make sure that they are not complicit in human rights abuses.
Labor	Principle 3 Principle 4 Principle 5 Principle 6	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced and compulsory labor; the effective abolition of child labor; and the elimination of discrimination in respect of employment and occupation.
Environment	Principle 7 Principle 8 Principle 9	Businesses are asked to support a precautionary approach to environmental challenges; undertake initiatives to promote greater environmental responsibility; and encourage the development and diffusion of environmentally friendly technologies.
Anti- corruption	Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery.

Key Sustainability Issues and Promotion Framework

MC's Sustainability Promotion Framework

MC has an Executive Committee that is chaired by the President and CEO and serves as the company's management decision-making body for company-wide matters and policies including those pertaining to sustainability. Under the direction of the Corporate Functional Officers, matters such as sustainability-related initiatives and issues are addressed in deliberation committees such as the Sustainability & CSR Committee and the Human Resources Development (HRD) Committee. Following this process, matters are submitted for approval or reported to the Executive Committee and the Board of Directors based on prescribed standards.

Sustainability Promotion Framework

A Member of the Board and Executive Vice President, in the capacity of Corporate Functional Officer, is in charge of business execution related to sustainability.

Fundamental policies related to sustainability are discussed by the Sustainability & CSR Committee, which is chaired by the Corporate Functional Officer, Corporate Sustainability, and attended by all business group CEOs, all Corporate Functional Officers responsible for Company-wide management, and the General Manager of the Corporate Strategy & Planning Department. Policies are then deliberated and decided upon by the Executive Committee. MC also established the Sustainability Advisory Committee in 2008, comprised of external experts representing MC's diverse stakeholders. This committee provides a range of advice regarding the MC Group's sustainability initiatives.

Starting in the fiscal year ending March 2018, the position of Group Chief Sustainability Officer was established in each business group with the goal of further promoting sustainability within each business group and creating a structure for further incorporating sustainability into business strategies and business promotion.



Diagram of the Sustainability Promotion Framework

*1 Corporate Functional Officers serve concurrently as Members of the Board.

 *2 EMS stands for environmental management systems (Please see page 11).

Key Sustainability Issues and Promotion Framework

Risk Management Framework

Risk Management Framework for Environmental and Social Aspects

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.

By having the Corporate Sustainability Department take part in all Investment Committee meetings for projects being deliberated by the Board of Directors and the Executive Committee, MC has put in place a screening process to facilitate decision-making that takes into account environmental and social impacts. ESG screening involves a review of Environmental and Social Impact Assessment (ESIA) reports and site visits. In addition, we also take into consideration various international guidelines, including the International Finance Corporation (IFC) guidelines and the "Japan Bank for International Cooperation Guidelines for Confirmation of Environmental and Social Considerations" established by the Japan Bank for International Cooperation (JBIC). The screening considers not only environmental aspects, but also social aspects including consideration for human rights and labor issues from a global perspective.

Sustainability Advisory Committee

The Sustainability Advisory Committee is comprised of external experts who represent MC's diverse stakeholder groups including NGOs, international agencies, ESG investors and academia. MC conveys its thinking on sustainability policies to Committee members and, with the aim of further improving stakeholder engagement, receives advice and recommendations from them. Moreover, MC

 Board of Directors
 Comment(s)

 Executive Committee
 Investment Committee

 Proposal application
 Corporate Sustainability Dept., etc.

 Proposal application
 Global environment (climate change, biodiversity, etc.)

 Applicant departments
 - Communities and society (indigenous peoples, cultural heritage, etc.)

Reference: For information on measures to address various ESG-related risks, please see the risk management information provided in each section.

conducts tours of business sites for committee members in order to deepen their understanding of the Company's businesses. At the Sustainability Advisory Committee meeting held in May 2018, MC received feedback about its initiatives and disclosures related to a variety of topics including MC's Key Sustainability Issues, climate change and supply chain management.



Eiichiro Adachi Counselor, The Japan Research Institute, Limited

Masaru Arai Chair, Japan Sustainable Investment Forum Keiko Katsu Freelance newscaster

Kaori Kuroda Executive Director, CSO Network Japan Takejiro Sueyoshi Special Advisor to the UNEP Finance Initiatives in the Asia Pacific Region

Toru Nakashizuka Specially Appointed Professor, Research Institute for Humanity and Nature Peter D. Pedersen Co-founder, E-Square Inc.

Yasushi Hibi Director of Japan Program, Conservation International

Screening Process for Loan and Investment Proposals

Key Sustainability Issues and Promotion Framework

On-site Observation Tour

In Autumn 2018, MC conducted an on-site observation tour of Japan CCS Co., Ltd.'s Tomakomai CCS Demonstration Project Center, which is located in Tomakomai City, Hokkaido Prefecture. Japan CCS Co., Ltd is part of a national project promoted primarily through the Ministry of Economy, Trade and Industry (METI), and the company is in charge of the management of operations, equipment, etc. for the project. It is a joint venture between 35 investors including utilities, oil & gas companies and trading houses, and MC is one of the investors.

Carbon Capture and Storage (CCS) is a technology that takes carbon dioxide (CO_2) emissions produced by factories, power plants and other industrial

WBCSD

MC has been a member of the World Business Council for Sustainable Development (WBCSD)^{*1} since the organization's founding in 1995, and since March 2016 has seconded an employee full-time to the WBCSD, tasked with advancing the SDGs. Through participation in the WBCSD's People Program^{*2} in particular, MC strives to strengthen the exchange of information and best practices with leading companies and apply such information to business practices.

Promoting Sustainability Internally

MC has continued to hold Sustainability Seminars since the fiscal year ended March 2016. These seminars serve as an opportunity to update employees on the latest information regarding the impact of global sustainability trends on the Company, and allow individual employees of the MC Group to consider how they can create value for society and the environment through their own work. The following is a list of past seminar topics (affiliated organizations and titles are accurate as of that time).

- 1st Seminar: "How COP21 Changes Business" (December 15, 2015) Takejiro Sueyoshi, Special Advisor to the UNEP Finance Initiatives in the Asia Pacific Region
- 2nd Seminar: "Global Business and Human Rights" (April 7, 2016) Kazuo Tase, Director, Deloitte Tohmatsu Consulting LLC
- 3rd Seminar: "Opportunities and Risks for Companies from the Transition to a Low Carbon Society" (July 14, 2016) Rintaro Tamaki, Deputy Secretary-General, Organization for Economic Co-operation and Development (OECD)
- 4th Seminar "Growth Opportunities for Companies from 21st Century Social Issues" (December 7, 2016) Hiroshi Komiyama, Chairman of the Institute, Mitsubishi Research Institute, Inc.

processes and captures them before they are released into the atmosphere. The CO₂ is carried to a depth suitable for underground storage, where it is kept safely over a long period. During the tour, processes including the injection of CO₂ into the ocean floor were



introduced, and with global warming progressing, information was shared regarding the potential role for and challenges surrounding CCS technology from the perspective of transitioning to a low-carbon society.

Since January 2018, Sunny Verghese, CEO of MC affiliate company Olam International, has been appointed Chair of the WBCSD.

- *1 The World Business Council for Sustainable Development. The WBCSD is an international organization working to facilitate sustainable development. It has approximately 200 member companies representing a broad range of industries from more than 30 countries.
- *2 A program established within the WBCSD that carries out activities mainly focused on the UN Sustainable Development Goals (SDGs), social impact, and sustainable lifestyles.



- 5th Seminar "New Challenges for Companies from Growth in ESG Investment" (May 24, 2017) Eiichiro Adachi, Counselor, The Japan Research Institute, Limited
- 6th Seminar "Learning from Examples of Leading Sustainability Management" (December 6, 2017) Mina Kanda, General Manager, *KAITEKI* Promotion Office, Corporate Strategy Division, Mitsubishi Chemical Holdings Corporation
- 7th Seminar "Toyota Motor's Initiatives Aiming for Sustainable Growth Together with Society" (September 6, 2018) Daisuke Nishida, Management Support Office, Toyota Motor Corporation

In addition to these Sustainability Seminars, MC is also working to raise employee awareness of sustainability issues primarily through the following measures.

- Holding training seminars, including rank-specific training
- Publicizing issues via the MC Group's internal magazine *RYOWA*
- Regularly publishing relevant news through internal Sustainability Issue Reports
- Holding events at MC FOREST (an internal facility promoting corporate philanthropy and sustainability initiatives)

Environmental

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Environmental Management

Policy

MC considers addressing sustainability challenges as one of its most important management issues (materiality). We have therefore been actively engaged in promoting a range of initiatives towards preserving the global environment through every aspect of our business. The cornerstone of these activities is our Environmental Charter, which was established in 1996. The charter clearly outlines our fundamental stance regarding environmental issues to all of our stakeholders. Based on this charter, MC conducts a variety of activities and strives to create and increase environmental value. The charter has been revised as necessary in order to reflect the fact that environmental issues and awareness are constantly evolving.

MC has established environmental management systems (EMS) that are compliant with ISO 14001, with the President & CEO serving as the chief officer in charge of EMS. In keeping with the spirit of the Environmental Charter, MC is advancing EMS activities based on its Environmental Policy.

MC's Environmental Policy

MC has established environmental management systems (EMS) based upon its Environmental Charter, and the Company has set out the following Environmental Policy with the aim of preserving the global environment and working towards the realization of a sustainable society through its business activities.

- 1 Compliance with Environmental Laws and Standards We will uphold environmental laws and standards in addition to our own environmental commitments.
- 2 Efforts to Improve the Environment
 - (1) We will make efforts to reduce our greenhouse gas emissions in order to address climate change.
 - (2) We will make efforts to reduce resource and energy consumption.
 - (3) We recognize the importance of biodiversity and will pay close attention to our impact on the natural environment.
- **3** Continuous Improvement of our EMS We will strive for continuous utilization and improvement to our EMS in line with our business activities.
- 4 Disclosure of our Environmental Policy We will ensure that our Environmental Policy is conveyed to all of our employees, and we will promote understanding through training and dissemination efforts. We will also publicly disclose our Environmental Policy.

Activity Plans and Targets

Under its environmental management systems (EMS), MC sets targets for both business activities and office activities, and works to reduce its environmental impact in each of these areas.

Business Activities

The MC Group has set a target to reduce its greenhouse gas (GHG) emissions per total assets by 25% by 2030 compared to year ended March 2017 levels. Initiatives with target subsidiaries to reduce emissions accordingly were also initiated.

Office Activities

MC is working to minimize the environmental impact of its office operations on a non-consolidated basis through reductions in electricity consumption, paper consumption, and waste production.

Reductions of Electricity and Paper Consumption

At its Head Offices, MC targets a reduction of 1% compared to the fiscal year ended March 2018. Individual targets and reduction measures are implemented at each branch and other offices in Japan.

Reduction of Waste Production

MC aims to reduce waste production at its Head Offices by 1% compared to the previous fiscal year in principle, and will revise this target based on conditions of the previous fiscal year.

MC aims to maintain its annual target for a waste recycling rate of at least 95%.

Numerical targets are not set for branches and other offices in Japan due to their status as tenants, and thus waste reduction and sorting for disposal is carried out according to the requirements of each building.

Reference: Paper consumption, water discharge, waste production, and recycling volume in the fiscal year ended March 2018 (numerical data) (P.50–51)

Structure

At MC, environmental management systems (EMS) are managed by the General Manager of the Corporate Sustainability Dept., who serves as the Environmental Manager, with the President & CEO of MC serving as the chief officer in charge of EMS. MC encourages

the participation of all employees in implementing EMS in cooperation with the Group Chief Sustainability Officer of each business group (EMS Promotion Officers in Japan), along with Group EMS Managers and other personnel.



As of April 1 2018

Status of ISO 14001 Acquisition

In 1998, MC acquired ISO 14001 certification at its Head Offices. In 1999, the following year, domestic branches were also added to the scope of certification. Individual group companies also comply with ISO 14001 depending on their individual status. * Certified sites (ISO 14001-certified sites):

- Seven domestic sites (Head Offices, Hokkaido Branch, Tohoku Branch, Chubu Branch, Kansai Branch, Chugoku Branch, Kyushu Branch)
- Three affiliated companies (Mitsubishi Corporation Financial & Management Services (Japan) Ltd., MC Facilities Co., Ltd., MC Communications Inc.)
- * Ratio of ISO 14001-certified sites: 100%
- * Scope of registration: Commodity trading and business investment activities

Business Group	Name of Company	Business Activities
Global Environmental &	Chiyoda Corporation	Plant engineering business
Infrastructure Business Group	Swing Corporation	Water business
	Lithium Energy Japan	Lithium-ion battery manufacturing and sales
	Mitsubishi Heavy Industries Compressor International Corporation	Design, production, packaging, servicing and repair of turbomachinery parts and products
	Metito Holdings Limited	Water management solutions
Industrial Finance, Logistics &	Mitsubishi UFJ Lease & Finance Company Limited	Leasing, installment sales, various types of financing, international business
Development Group	AGP Corporation	Supply of airport ground power, maintenance of airport facilities, food cart manufacture and sales
	Mitsubishi Corporation LT, Inc.	Comprehensive logistics service, freight forwarding, warehousing
Energy Business Group	PT Donggi Senoro LNG	Natural gas liquification and LNG sales
	Namikata Terminal Co., Ltd.	Logistics and storage for LPG and other products
Metals Group	Metal One Corporation	Steel products business
	Mitsubishi Corporation RtM Japan Ltd.	Mineral resources trading company for Japanese clients
Machinery Group	Nikken Corporation	Construction Equipment & Rental Business
	Mitsubishi Corporation Technos	Sales of machine tools and industrial machinery
	The Colt Car Company Ltd.	Distribution of automobiles
Chemicals Group	Mitsubishi Shoji Chemical Corporation	Marketing of solvents, paints, coating resins and silicones
	Mitsubishi Corporation Plastics Ltd.	Marketing of synthetic resin raw materials and products
	Chuo Kagaku Co., Ltd.	Manufacturing of plastic food containers
	Amfine Chemical Corporation	Manufacturing of stabilizers and additives for plastics
	MC Ferticom Co., Ltd.	Manufacturing of fertilizers
	MC Food Specialties Inc.	Manufacture or flavorings (food ingredients) and food chemicals
	Meiwa Corporation	Trading company
	Chuo Kasei Co., Ltd.	Marketing of chemical products
Living Essentials Group	Mitsubishi Shoji Packaging Corporation	Marketing of packaging materials, packaging related machines, paper, paperboard and corrugated container board, as well as import, export, and international trade of paper and paperboard
	Mitsubishi Shokuhin Co., Ltd.	Domestic and international wholesale and distribution of processed foods, frozen and chilled foods, alcoholic beverages and confectionaries
	Nihon Shokuhin Kako Co., Ltd.	Manufacturing of corn starch and related processed products
	Nitto Fuji Flour Milling Co., Ltd.	Flour miller
	Kanro Co., Ltd.	Confectionery manufacture and sales
	Japan Farm Co., Ltd.	Poultry/swine breeding and processing, and development, manufacture, and sale of processed food products
	Lawson, Inc.	Franchise chain development of convenience stores
	Cermaq Group AS	Salmon farming business
	Princes Limited	Food and beverage manufacturing
Corporate Staff Section	Mitsubishi Corporation Financial & Management Services (Japan) Ltd.	Financial, accounting, and inspection services, corporate finance and management consulting service
	MC Facilities Co., Ltd.	Facility management for buildings and offices, and general business support

Main MC Group Companies with ISO 14001 Certification

Environmental Audits

MC conducts internal environmental audits every year in accordance with ISO 14001. Audits are conducted by forming audit teams comprised of members of the Corporate Sustainability Dept. The audit teams confirm whether EMS is being effectively implemented in each business group. The audit teams report their findings to the President & CEO, who serves as the chief officer in charge of EMS.

Environmental Communications

When MC is requested by customers or other external stakeholders to provide environmental information, MC discloses this information by following the processes stipulated by the ISO 14001 standards.

This information includes questionnaire responses and certified copies of documentation associated with the ISO certification process.

In the fiscal year ended March 2018, MC responded to 55 questionnaires and provided 11 certified copies of its ISO documentation.

Initiatives

Environmental Education

With regard to EMS promotion, MC strives to improve awareness and impart specialized knowledge through overall briefings on EMS, internal environmental audits, environmental laws and regulations and related matters. These briefings are organized by the EMS Promotion Committee, which is comprised of Group EMS Support Members from each internal department and business group.

Furthermore, in the fiscal year ended March 2018, MC held seminars on topics including the ISO 14001 standards and environmental audits/laws and regulations. When compliance with revised environmental laws and regulations requires new measures, MC holds seminars to disseminate the information throughout the Company.

Use of Life Cycle Assessment (LCA) at Cermaq ASA

Cermaq, an MC subsidiary, uses life cycle assessments (LCAs) for the fish feed management over the two-year salmon maturation process in order to reduce environmental impacts including waste and CO₂ emissions. This is important since fish feed has been identified as an important contributor to resource use and emissions related to the production of salmonids in net-pen systems. By conducting research on optimal feed ingredients and methods, Cermaq is proactively seeking improvements and identifying efficient feeding methods in its operations. One example of ongoing projects on fish feed is research conducted at the Arctic Salmon Research Centre, where Cermaq is a partner, doing research on optimal feed for salmon farming in the Arctic environment in Northern Norway.

Reference: Cermaq's corporate website

https://www.cermaq.com/wps/wcm/connect/cermaq/ cermaq/our-sustainable-choice/research-and-innovation/

https://www.cermaq.com/wps/wcm/connect/cermaq/ cermaq/our-sustainable-choice/sustainability-16/ material-topics/life-cycle-assessment

Relevant Data

Number of Environmental Reports and Corrective Measures

In the implementation of EMS, a system has been established for reporting and correcting matters relating to infringements of laws and ordinances as well as guidance from authorities. The incidents are shared throughout the company and measures are taken to prevent recurrences.

Number of Environmental Reports and Corrective Measures

	2016.3	2017.3	2018.3
Number of reports	0	1	3
Number of corrective measures	0	1	3
(Including matters resulting in fines, penalties, etc.)	0	0	0

A reporting system which uses a compliance hotline has been instituted to appropriately respond to accidents and disasters when they occur and to promptly implement measures to prevent recurrence. The system covers not only MC but group companies as well.

Going forward, MC will continue to promote EMS as well as measures to address environmental contamination such as oil pollution. Concurrently, in the event of an environmental incident, MC will promptly report the incident to the relevant parties and investigate the causes, along with considering appropriate remedial measures and preventive measures. In doing so, MC will rigorously implement measures to prevent a recurrence of the incident.

Reference: Compliance System Diagram (P.153)

Costs Related to Pollution, Waste Production and the Use of Raw Materials

Environmental Conservation Costs in the Fiscal Year ended March 2017

Catagony	2017.3		2018.3		
Category	Investment	Cost	Investment	Cost	
Global environmental conservation cost	0	0	0	0	
Resource recycling cost*	0	¥11,275,000	0	¥10,168.000	
Total	0	¥11,275,000	0	¥10,168,000	

* Outsourcing of waste treatment and recycling-related services

Scope of aggregation and basis for calculation:

Aggregated for Head Offices

• Aggregated based on the Ministry of the Environment "Environmental Accounting Guidelines 2005"

Environmental Conservation and Economic Impacts of Waste Production and Consumption of Electricity, Paper, and Water in the Fiscal Year ended March 2017

	2017	.3	2018	3.3
Waste Production	630.6 tons	¥11,275,000	566.5 tons	¥10,168,000
Electricity Consumption	4,750,000 kWh	¥96,604,000	4,640,000 kWh	¥102,199,000
Paper Consumption	52,300,000 sheets	¥29,880,000	48,050,000 sheets	¥27,064,000
Water Consumption	45,618m ³	¥32,894,000	44,992m ³	¥32,740,000

Scope of aggregation and basis for calculation:

Aggregated for Head Offices

• Aggregated based on the Ministry of the Environment "Environmental Accounting Guidelines 2005"

Policy

Environmental Business Policy

Environmental issues related to climate change, water resources, etc. serve as an important perspective for MC's business strategy. For instance, we aim to achieve at least 20% renewable energy in MC's power generation business (by 2030, based on generation amount). In the offshore power transmission business, which supports the increased market penetration of renewable energy, MC was the first Japanese company to enter the market in Germany and the UK, with the aim of establishing a solid position in the industry. MC will also challenge itself by working to develop new, game-changing technologies that significantly reduce GHG emissions, and by building innovative business.

R&D Policy

Within the Global Environmental & Infrastructure Business Group, MC has established the Environment Business R&D Department to support the active development of commercial-scale environmental businesses over the mid to long-term (including hydrogen energy and nanotechnology).

Relevant Businesses and Data

Decarbonized/Low-Carbon Energy

Renewable Energy and Cogeneration Businesses

With the introduction of government subsidies and technological advancements, opportunities are anticipated for businesses such as renewable energy and clean gas-fired power generation.

Renewable Energy Projects

Country	Power plant	Fuel	(As of July 31. 2018 Net equity basis (Net, 10,000 kW
Philippines	UPC wind power IPP	Wind power	2.2
Indonesia	Star Energy	Geothermal	7.9
Laos	Nam Theun 2	Hydropower	4.6
Thailand and others	Other renewable energy projects owned by EGCO	Solar power Wind power Geothermal Waste Biomass	7.0
Malaysia	Gebeng Solar	Solar power	0.3
Canada	Aurora Solar	Solar power	3.7
Spain	MC Solar cascaras de cofin	Solar power	0.1
Portugal	Amper	Solar power	1.2
France	Toul-Rosières SAS1	Solar power	2.2
France	Crucey SAS1	Solar power	1.4
France	Massangis SAS 2	Solar power	0.8
France	Ecotera/Plaine de l'Escrebieux	Wind power	0.6
France	Ecotera/Seuil de Bapaume	Wind power	0.8
France	Ecotera/Basse Thierache Sud	Wind power	1.2
France	Ecotera/Plateau d'Andigny	Wind power	1.1
Netherlands	Luchterduinen	Offshore wind power	6.5
Jordan	Shams Maan	Solar power	1.8
Japan	Kumamoto Aso Solar	Solar power	0.2
Japan	Onahama Solar	Solar power	0.5
Japan	Onahama/Izumi Solar	Solar power	0.2
Japan	Komatsushima Solar	Solar power	1.3
Japan	Tahara Solar	Solar power	2.8
Japan	Nagasaki Solar	Solar power	0.5
Japan	Higashi Nozaki Solar	Solar power	0.7
Japan	Kochi Solar	Solar power	1.3
Japan	JAMC Solar	Solar power	2.1
Japan	Gonoike Bioenergy	Biomass (exclusive combustion)) 1.1

Cogeneration Projects

		(As of July 31. 2018)
Power plant	Fuel	Net equity basis (Net, 10,000 kW)
MCKB Energy Services	Gas Biogas	3.2
MC Kawajiri Energy Services	Gas	3.8
MC Shiohama Energy Services	Gas Coal	9.7
MCJ Energy Services	Gas	2.2
Gonoike Bioenergy Services	Biomass exclusive combustion	1.1
MCM Energy Services	Coal Biomass mixed combustion	5.2
MC Hokuetsu Energy Services	Gas	2.0
Other projects owned by EGCO	Gas	7.2
	MCKB Energy Services MC Kawajiri Energy Services MC Shiohama Energy Services MCJ Energy Services Gonoike Bioenergy Services MCM Energy Services MC Hokuetsu Energy Services	MCKB Energy ServicesGas BiogasMC Kawajiri Energy ServicesGasMC Shiohama Energy ServicesGas CoalMCJ Energy ServicesGasGonoike Bioenergy ServicesBiomass exclusive combustionMCM Energy ServicesCoal Biomass mixed combustionMCM Energy ServicesGas

Gas-Fired Projects

(As of July 31. 2018)

Country	Power plant	Net equity basis (Net, 10,000 kW)
USA	Frontier	23.2
USA	Gateway	23.5
USA	Georgia	28.4
USA	Alabama I	29.5
USA	Wildflower/Indigo	13.9
USA	Wildflower/Larkspur	9.3
USA	Mariposa	19.5
USA	Sentinel	36.4
Philippines	Ilijan	25.2
Thailand and others	Khanom 4	11.4
Thailand and others	Kaen Khoi 2	9.0
Mexico	Tuxpan II	24.8
Mexico	Tuxpan V	24.8
Jordan	IPP-3	20.1
Qatar	Facility D	50.4
Japan	Naoetsu Plant, Mitsubishi Chemical Corporation	10.6

(As of July 31 2018)

Energy Storage and Power Transmission

With the declining costs of renewable energy and technological advances in energy storage, distributed generation will cover more power demand. This means electricity from small-scale power generators installed on the user side will be expanded with support of the existing power grid, which is based on the transmission and distribution of electricity from large-scale power plants to users.

Energy Storage

				(AS OF JULY 31, 201)
	R&D expenses		Specific project example	25
Energy storage Not disclosed		Energy storage field trials with Tata Grou	battery storage project (Germany)	
ower Transmissi	on			(As of July 31. 201
Country	Portfolio asset	Transmission capacity (10,000 kW)	MC's share	Cable route length (Onshore/offshore km)
	Walney 1	18.4	50%	2.7/45.3
	Walney 2	18.4	50%	5.1/43.2
UK	Sheringham Shoal	31.5	50%	22/23
	London Array	63	50%	0.8/54
	Burbo Bank Extension	25.8	50%	10.4/24.3
	Total	157	_	41/189.8
	BorWin 1	40	25%	75/125
C	BorWin 2	80	25%	75/125
Germany	DolWin 2	90	25%	90/45
	HelWin 2	69	25%	45/85
	Total	279	_	285/380

LNG Bunkering

MC is involved in the LNG fuel^{*1} supply and marketing business for ships. Here, one of its major initiatives was the launch of the Gas4Sea^{*2} brand in the marine fuel supply business. Through Gas4Sea, MC aims to promote widespread adoption of LNG as a marine fuel, given its lower environmental impact and outstanding safety and cost effectiveness compared with conventional fossil fuels.

^{*1} LNG does not contain any source materials such as SOx or particulate matter (PM). Therefore, switching to LNG can reduce SOx and PM emissions by nearly 100% compared with conventional heavy oil. In addition, CO₂ emissions can be reduced by approximately 30%, whereas NOx emissions can be cut by up to 80%.

^{*2} A new brand launched in September 2016 by MC, ENGIE and Nippon Yusen Kabushiki Kaisha (NYK Line) to undertake marketing of LNG fuel for ships via ship to ship transfer around the world.

Green Buildings

REIT asset management company Mitsubishi Corp. UBS Realty Inc. (MCUBSR), through one of its funds, is promoting initiatives for showing consideration to the environment and reducing environmental impact. These include implementing environmental and energy-saving measures at its properties and working to improve their energy efficiency. These initiatives have been highly rated, with MCUBSR acquiring the following environmental certifications and ratings:

MCUBSR Green Real Estate		(As of August 31, 2018)
Japan Retail Fund Corporation		
Certifications received	Rank	Year
GRESB	Green Star	2015, 2016, 2017, 2018
CDP Climate Change Program	C	2016, 2017

Certifications received	Property	Evaluation rank	Gross floor area (m ²)	Acquisition price (¥ million
CASBEE	AEON Itabashi Shopping Center	Rank S	33,098.88 m ² has been certified (Area corresponding to ownership %), out of the total rentable area of 64,096.14 m ²	12,411
	AEON Naha Shopping Center	Rank S	72,997.08	10,830
	Ito-Yokado Yotsukaido	Rank S	55,977.58	13,744
	Ario Otori	Rank S	95,135.36	19,040
	AEON MALL Kobe Kita	Rank S	128,031.55	10,920
	AEON MALL Yamato	Rank S	85,226.68	16,823
	AEON MALL Sapporo Naebo	Rank S	66,893.18	9,260
	AEON MALL Sapporo Hassamu	Rank S	102,162.16	18,818
	AEON MALL Musashi Murayama	Rank S	137,466.97	30,600
	AEON MALL Tsurumi Ryokuchi	Rank S	138,538.63	29,902
	AEON MALL Itami	Rank A	144,723.12	21,488
	Higashi-Totsuka Aurora City	Rank S	150,684.26	50,500
DBJ Green Building	G-Bldg. Kichijoji 02	***	8.534.71	15,300
Certification	G-Bldg. Midosuji 02	**	1,389.79	15,000
	MARINE & WALK YOKOHAMA	***	12,670.93	11,300
	m-city Toyonaka	**	33,301.93	5,570
	KAMISHIN PLAZA	***	Main: 17,734.13 Annex: 253.46 Machinery block: 39.10 Food court building: 637.57	3,900
	Bic Camera Tachikawa	***	20,983.43	11,920
	SEIYU Hibarigaoka	**	19,070.88	6,100
	pivo Izumi Chuo	*	pivo bldg: 7,146.70 Tecc Land bldg: 10,258.96	6,000
	La Porte Aoyama	*	6,572.29	9,400
	G-Bldg. Jiyugaoka 01 (Bldg. A)	**	1,367.43	2.002
	G-Bldg. Jiyugaoka 01 (Bldg. B)	**	895.12	3,093
	Narupark	****	47,442.30	8,540
	DFS T GALLERIA OKINAWA	****	42,088.14	15,600
	Kyoto Family	****	44,292.44	5,340
	Abiko Shopping Plaza	****	55,761.48	10,322

Japan Retail Fund Corporation

Certifications received	Property	Evaluation rank	Gross floor area (m ²)	Acquisition price (¥ million)
DBJ Green Building Certification	KAWASAKI Le FRONT	****	Main: 88,818.38 Parking lot tower: 5,705.63	30,000
	Nara Family	****	115,707.41	34,875
	mozo wonder city	****	Main: 229,976.30 Annex: 3,630.43	55,480
	Oyama Yuen Harvest Walk	****	60,788.15	10,709
	GYRE	***	8,578.85	22,712
BELS	G-Bldg. Jiyugaoka 01 (Bldg. B)	****	895.12	993

Industrial & Infrastructure Fund Investment Corporation

Certifications received Rank		Year		
GRESB	Green Star	Green Star 2013, 2014, 2015, 2016, 2017, 2018		7, 2018
Certifications received	Property	Evaluation rank	Gross floor area (m ²)	Acquisition price (¥ millio
CASBEE	IIF Fukuoka Hakozaki Logistics Center	Rank S	34,982.08	9,044
	IIF Kashiwa Logistics Center	Rank A	17,379.78	1,810
	IIF Iruma Logistics Center	Rank A	17,881.65	3,184
	IIF Higashi-Osaka Logistics Center	Rank A	20,247.86	2,280
	IIF Kyotanabe Logistics Center	Rank A	33,243.99	5,730
	IIF Kawasaki Science Center*	Rank A	4,857.73	2,168
	IIF Hiroshima Logistics Center*	Rank B+	Building 1: 22,539.51 Building 2: 228.73	3,540
	IIF Nishinomiya Logistics Center (Extension)*	Rank B+	6,075.58	859
DBJ Green Building	IIF Hiroshima Logistics Center	****	22,768.24	3,540
Certification	IIF Kobe Logistics Center	****	39,567.74	5,193
	IIF Tosu Logistics Center	****	13,836.97	1,570
	IIF Koshigaya Logistics Center	****	9,688.47	2,000
	IIF Noda Logistics Center	****	38,828.10	6,500
BELS	IIF Kashiwa Logistics Center	****	17,379.78	1,810
	IIF Yokohama Tsuzuki Logistics Center	****	9,562.26	2,350
	IIF Nishinomiya Logistics Center (Extension)	****	6,075.58	859
	IIF Hiroshima Logistics Center	****	Building 1: 22,539.51 Building 2: 228.73	3,540
	IIF Kawasaki Science Center	**	4,857.73	2,168
	IIF Haneda Airport Maintenance Center	**	Maintenance Center 1: 49,823.52 Attached Bldg.Total: 159.81 Maintenance Center 2: 31,940.32 Attached Bldg.Total: 72.16	41,110
	IIF Atsugi Logistics Center III	**	16,470.24	2,290
	IIF Shinagawa IT Solution Center	**	10,479.42	7,200

* CASBEE Locally Customized Edition for Municipalities

MCUBS MidCity

Certifications rec	Certifications received Ran		Year
GRESB	GRESB Green Star		2016, 2017, 2018

Certifications received	Property	Evaluation rank	Gross floor area (m ²)	Acquisition price (¥ million)
CASBEE	Higobashi MID Bldg.*	Rank A	6,519.63	3,000
DBJ Green Building	Twin 21	****	146,034.98	68,700
Certification	Matsushita IMP Bldg.	****	84,952.57	24,600
	Kitahama MID Bldg.	****	14,648.13	10,800
	Higobashi MID Bldg.	****	6,519.63	3,000
BELS	Kitahama MID Bldg.	***	14,648.13	10,800
	G-Square Shibuya Dogenzaka	**	6,565.87	12,220
	Higobashi MID Bldg.	**	6,519.63	3,000

* CASBEE Locally Customized Edition for Municipalities

 Reference:
 Properties Eligible for Green Property Designation

 http://www.jrf-reit.com/english/structure/sustain_env.html

 http://www.iif-reit.com/english/structure/sustain_env.html

 http://www.midcity-reit.com/en/sustainability

Data by Property

Japan Retail Fund Investment Corporation Industrial & Infrastructure Fund Investment Corporation MCUBS MidCity Investment Corporation http://www.jrf-reit.com/english/ http://www.iif-reit.com/english/ http://www.midcity-reit.com/en/ Environmental

Water Business

MC will contribute to solving various challenges pertaining to water resources throughout the world by developing water-related infrastructure and resolving local water issues.

Business investees	Business category	Business overview	Major initiatives
South Staffordshire Plc	Water	South Staffordshire Plc provides water utility services from water intake to distribution and customer management in the Birmingham and Cambridge areas in the United Kingdom (UK). It	• South Staffordshire Plc has a specialist team with capabilities to reduce leakages within water networks. In addition to reducing leakages in its own service areas, it provides services to other water utilities in an effort to sustain finite water resources.
		also provides technical and customer management services to other water utilities through its 30+ offices throughout the UK.	 Every 5 years, water utility companies in the UK are required to formulate a long-term water resource management plan for the following 25 years. This plan must include sustainability considerations for developing and obtaining water resources.
			 As part of the company's efforts to conserve water sources as well as support regional measures towards flooding, South Staffordshire Plc has installed a system to reuse rainwater in a newly developed area in the Cambridge region. This project is being jointly conducted with Cambridge University, and it will be the UK's largest water recycling system.
			• With the aim of protecting water sources and watersheds, South Staffordshire Plc established a fund that provides financial support to regional farmers through initiatives including environmentally conscious agricultural infrastructure maintenance and farming method training. In addition, the company set up another fund with the aim of conserving local biodiversity, which has provided financial support to projects including hiking trail maintenance and educational initiatives to teach children about the region's natural environment.
Metito Holding Water and wastewater treatment, seawater desalination, industrial water treatment	Metito designs, procures, constructs, owns and manages water and wastewater treatment plants, industrial water treatment plants and seawater desalination plants in the Middle East, Africa and Asia. It provides water-related solutions optimized for the different regions to improve	 Metito has been managing long-term desalination projects in Egypt since 1999 to supply water to drought regions along the Red Sea coast. In addition, Metito is constructing a large-scale desalination facility for the Egyptian government and is contributing to the improvement of the region's water infrastructure. 	
		 Metito has been constructing desalination plants in water scarce Qatar, contributing to the stable supply of drinking water to the region through the long-term management of those facilities. 	
Swing Corporation	Water and wastewater treatment, industrial water treatment	Swing Corporation is a private water utility that designs, constructs, operates and maintains water infrastructure facilities. It develops water related infrastructure to provide optimized water solutions to clients in Japan and overseas. It also promotes resource recovery and beneficial reuse through sewage and wastewater treatment, and contributes to protecting the global environmental	 Swing Corporation is engaged in phosphorus recovery from sewage sludge for fertilizer use at Higashinada Sewage Treatment Plant in Kobe, Hyogo Prefecture. Phosphorus mining is not viable in Japan and therefore Japan is dependent on imports from China. Phosphorus recovered through this project is used for agriculture in Kobe, thereby promoting resource recovery through local production for local consumption and recycling.
		and enhancing sustainability the realization of sustainable societies.	 Swing Corporation developed a Private Finance Initiative (PFI) project in the city of Kurobe, Toyama Prefecture to establish a facility for the beneficial reuse of sewage biomass. An SPC led by Swing Corporation financed, designed, built, operates and maintains the facility. The sewage sludge is mixed with coffee residue before it is processed through methane fermentation, dewatering and drying. This reduces the sludge volume by half while enabling its beneficial reuse as compost and biofuel. (In fiscal 2011, the project won the sustainability category of wastewater recycling award sponsored by the Minister of Land, Infrastructure, Tourism and Transport.)

Environmental

Social

R&D

	Examples of significant projects
Hydrogen energy	Hydrogen Supply Chain Demonstration Project utilizing the Organic Chemical Hydride Method
Nanotechnology (fullerene business)	Frontier Carbon Corporation Vitamin C60 BioResearch Corporation
Lithium-ion batteries	Lithium Energy Japan*
CCS (Carbon Capture and Storage)	Japan CCS Co., Ltd.
Joint Crediting Mechanism	Participation in "Project to Promote Green Hospitals" in Vietnam
Third-party disposal services for vehicle write-offs	ABT Corporation

* Lithium Energy Japan

Established in 2007 as a joint venture company through investments by MC, Mitsubishi Motors Corporation and GS Yuasa Corporation, Lithium Energy Japan develops, manufactures, and markets large-capacity lithium-ion batteries.

Within the R&D sector, MC is developing businesses in areas such as hydrogen energy and nanotechnology (using fullerene).

For example, MC is focused on hydrogen as a next-generation clean energy alternative which helps cut CO₂ emissions and combat global warming. To prepare for the new era utilizing hydrogen for large-scale power generation, we are taking part in a hydrogen supply chain demonstration project sponsored by Japan's New Energy and Industrial Technology Development Organization (NEDO) that utilizes the organic chemical hydride method. This project aims to build a hydrogen supply chain that originates overseas. The plan calls for supplying up to 210 tons of hydrogen in 2020.

We are also involved in initiatives aimed at making a hydrogen society a reality. MC is part of the Hydrogen Promotion Team organized by the Tokyo Metropolitan Government and is a member of the Hydrogen Council, joined by leading multinationals including Toyota Motor Corporation and Royal Dutch Shell.

In the nanotechnology-related business, the MC Group owns approximately 150 substance and other patents for fullerene. We are developing industrial and life science applications and related businesses based on fullerene technology. Since fullerene has functional utility even in small quantities, we are working on applications for organic devices such as energy-saving organic thin-film solar cells.

Other business developments are outlined below.

- CCS (carbon capture and storage) CCS is one of the most important low-carbon and decarbonization technologies. MC is involved in a pilot project led by Japan CCS Co., Ltd. at Tomakomai, Japan to test its commercial
 - feasibility. (As of the end of August 2018, the project had successfully captured and stored approximately 200,000 tons of carbon dioxide).
- Joint Crediting Mechanism

We are involved in the NEDO-supported "Promotion of Green Hospitals by Improving Efficiency/Environment in National Hospitals" in Vietnam as part of the Japanese government's Joint Crediting Mechanism (CO2 reduction: 878 tons).

• Collaboration with universities/research institutions We are collaborating with Tokyo Institute of Technology and Battelle Memorial Institute to identify and study medium- to long-term business themes for decarbonization and low-carbon husiness

Initiatives to Promote Electric Vehicles

Currently, it is said that the transportation sector accounts for approximately 20% of global CO_2 emissions, and the reduction of CO_2 emissions as well as of the use of fossil fuels in the automotive industry pose significant issues.

As part of its involvement in the automobile sales business worldwide, with a focus on Japan and Europe, MC is engaged in

expanding the sales of the i-MiEV*¹, an electric vehicle, and the Outlander PHEV*², a plug-in hybrid electric vehicle, both manufactured by Mitsubishi Motors Corporation (MMC), which have less impact on the environment while operation. Through the promotion of these electric vehicles, MC is contributing to the realization of a low-carbon and sustainable, energy-efficient society.

Sales Expansion and Promotion Activities

MC implements a variety of initiatives, including through collaboration with local affiliates, to promote and expand sales for the i-MiEV and Outlander PHEV which are developed and sold by MMC.

MC further promotes electric vehicles through initiatives such as hosting test-ride events, participating in events which utilize electric vehicles, collaborating in environmental initiatives with other companies including power companies, and participating in energy-saving projects that utilize electric vehicles.

In Europe, MC sells roughly 20,000 Outlander PHEV vehicles annually. In the UK, MC has actively worked to expand sales of this model, and as of March 2018, the total cumulative sales of the Outlander PHEV in the country is over 35,000 vehicles.

In addition, based on an agreement executed between the governments of Japan and Georgia regarding official development assistance (ODA) for the purpose of providing next-generation vehicles, MC delivered 96 MMC electric vehicles (45 Outlander

PHEV and 51 i-MiEV) to Georgia in 2018. At the delivery ceremony held in Tbilisi, several government officials including the Georgian Prime Minister were in attendance.



Outlander PHEVs provided to the Georgian government

Creating an Environment Where Electric Vehicles Can Be Driven Safely

Increasing the number of power charging spots is important for the popularization of electric vehicles. The operation range of electric vehicles can be extended if power charging is possible along the way and at the destination. MC, together with its group companies

and business partners, promotes the installation and proliferation of electric vehicle charging infrastructure, supporting environments that make it easier for people to use electric vehicles.



Toward Further Performance Improvement of Electric Vehicles

MC supports MMC as a sponsor using electric vehicles to compete in the long-running Pikes Peak International Hill Climb Race. During the 2014 race, MMC took first and second place in the electric vehicle category (and second and third place in the overall ranking), demonstrating the exceptional electric vehicle technology and fourwheel drive capability of MMC's vehicles. This was an opportunity for these electric vehicles with advanced technology to be widely known as "cars that are safe and fun to drive." Data from these races has also been used to make further improvements to electric vehicle controls and other advanced technologies. In addition, the race cars are powered by lithium ion batteries produced by Lithium Energy Japan.

*1 i-MiEV

*2 Outlander PHEV

The world's first plug-in hybrid SUV. Its Plug-in Hybrid EV System automatically selects the most fuel-efficient operating function based on factors such as driving situation and battery levels. This allows for both environmentally-friendly EV driving for everyday usage, as well as optimum driving mode for extended trips.

A first of its kind electric vehicle launched in 2009, the i-MiEV runs on 100% electricity, completely free of emissions including CO_2 , as well as NOx (nitrogen oxide) and PM (particulate matter) which contribute to air pollution. The vehicle's high-capacity battery allows for sufficient driving distances for daily use.

Climate change

External Environment

The impacts of climate change are becoming increasingly severe year after year. Climate change is now having a significant impact on the environment, society and people's daily lives as well as on corporate business activities.

The Paris Agreement was adopted in 2015 to reduce global greenhouse gas emissions. The agreement has heightened expectations not only for countries and governments to fulfill key roles in mitigating climate change, but also for the private sector as well. Companies are expected to implement measures to achieve a low-carbon/carbon-free society through their business activities.

There have also been stronger calls for companies to provide disclosure of climate change-related information, two such examples being Climate Action+100 and the TCFD.* The former is an initiative led by institutional investors and the latter was launched by the Financial Stability Board (FSB) in 2015. Its purpose is to encourage the disclosure of information that will enable investors and other stakeholders to properly monitor and evaluate the climate-related risks of companies.

* TCFD: Task Force on Climate-Related Financial Disclosures. In June 2017, the TCFD announced its recommendations on climate-related financial disclosures in order for investors to be able to make appropriate investment decisions. Please see the details in the column below. The General Manager of MC's Corporate Sustainability Department is a TCFD member and data preparer, and mainly through its involvement in the task force's seminars and meetings, MC is supporting the TCFD's activities and helping its recommendations to take root throughout the business community.

Policy

Our planet and its ecosystems, human beings and corporate activities are highly vulnerable to climate change. At MC, our belief is that while climate change does pose significant threats, it also presents the MC Group with new business opportunities.

Accordingly, MC has identified "Transitioning to a Low-Carbon Society" as one of the key issues for management to address and respond to as the Company strives to achieve sustainable growth. MC aims to fulfill its mandate to meet the demand for energy, while at the same time helping to achieve international objectives, such as the UN Sustainable Development Goals (SDGs) and the 2° target laid out in the Paris Agreement. To realize that aim, MC works in collaboration with a wide range of stakeholders, including governments, other businesses and industry associations.

MC also recognizes the importance of climate-related financial disclosures and supports recommendations made by the TCFD. The company continues to strive to expand its information disclosure in line with the recommendations.

COLUMN

TCFD Recommendations (June 2017)

The FSB launched the TCFD in 2015, in recognition of both the likelihood that climate change would result in further risks and opportunities for businesses in the future, and the heightening concerns about it destabilizing the value of assets and financial markets. To help the markets to properly evaluate those risks and seize the opportunities they present, the TCFD established a voluntary framework for climate-related financial disclosures in June 2017.

The Core Elements of the TCFD's disclosure recommendations are Governance, Strategy, Risk Management, and Metrics and Targets. All are premised on the importance of investors understanding what impacts climate-related risks and opportunities could have on the cash flows, assets and liabilities of the companies they are investing in, so that they can make informed decisions when considering where to allocate their capital.

Core Elements of TCFD's Climate-Related Financial Disclosures

Governance	The organization's governance around climate-related risks and opportunities	
Strategy	The actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning (including analyses of the 2° C Scenario, etc.)	
Risk Man- agement	The processes used by the organization to identify, assess, and manage cli mate-related risks	
Metrics and Targets	The metrics and targets used to assess and manage relevant climate-related risks and opportunities	



Response to TCFD

Due to the high degree of uncertainty surrounding the impacts of climate change, MC has adopted a flexible portfolio capable of adapting to medium to long-term changes in its operating environment. MC believes it is vital to capture business opportunities associated with climate change and take appropriate action to mitigate risks.

The TCFD provides business entities and investors with guidelines on voluntary climate-related financial disclosures and information useful for their decision making. MC utilizes these TCFD

Governance

Climate change is one of the most important issues acknowledged by MC's top management. MC's basic policy on climate change and important matters therein are deliberated and decided upon by its Executive Committee, the company's officer-level decision-making body.

As stipulated in the regulations governing MC's board of directors, the Executive Committee reports its findings regularly (at least once a year) to the board, appropriate supervision of which is facilitated by the structure of MC's governance framework. Before

Board of Directors and Executive Committee Deliberations and Reports

Basic Policy on Climate Change	Covers climate-related initiatives through the compa- ny's businesses, adoption of TCFD recommendations, details on climate-related financial disclosures, etc.
Important Matters	Assessments of climate-change risks and business opportunities (including scenario analyses), green- house-gas reduction targets and action plans, etc.

data as benchmarks for verifying its own climate-related action plans, identifying growth opportunities and strengthening risk management in ways that are designed to ensure its sustainable growth.

Portions of the TCFD's recommendations are still in the discussion stages, and others may take several years before action can be taken. Nevertheless, MC will disclose its efforts in a stepwise fashion to strengthen its information disclosure.

the Executive Committee has addressed basic policy and important matters pertaining to climate change, actions are taken by MC's Sustainability Advisory Committee and Sustainability & CSR Committee. The former fields opinions and advice from outside experts, and the latter (which reports directly to the Executive Committee) holds extensive hearings with all of the Business Group CEOs.

The Business Groups also act independently to address climate change. Group Chief Sustainability Officers and Group Sustainability Managers are appointed within each Group's department responsible for management strategy in order to oversee sustainability-related initiatives (including climate change) and reflect climate-related opinions and information into their respective businesses and strategies.

At MC, the company's basic policy on climate change and important matters therein are comprehensively addressed when making decisions on business strategies and investments.

Board of Directors	Supervises MC's climate-related actions and initiatives	Convenes approx. once per year
Executive Committee	Makes decisions regarding MC's basic policy on climate change Makes decisions regarding important matters pertaining to climate change	Convenes approx. 2-3 times per year
Sustainability & CSR Committee (reports directly to Executive Committee)	Deliberates on MC's basic policy on climate change and important matters therein, and reports findings to Executive Committee	Convenes approx. 2-3 times per year
Sustainability Advisory Committee	Offers advice and recommendations regarding MC's basic policy on climate change and important matters therein	Convenes approx. twice per year
Officer in Charge	Iwao Toide (Member of the Board, Executive Vice President, Corporate Functional Officer, Business Investment Management, Corporate Sustainability, AI/IoT)	
Department in Charge	Corporate Sustainability Department	

Climate-Change Governance Structure

Reference: Diagram of the Sustainability Promotion Framework

Climate change

Strategies

MC considers the opportunities and risks associated with climate change to be key variables in establishing its business strategies, and recognizes the possibility that the impact of climate change on its operations will grow over the medium to long term. Accordingly, MC is identifying where the risks and opportunities are likely to reveal themselves up to and even beyond the year 2030. Regular internal analyses and assessments also factor in changing external trends.

Main Opportunities and Risks Associated with Climate Change

Transition Risks and Opportunities

Regulations	 Low-carbon and carbon-free products / proliferation of service-related subsidies Growing operational and systems-related costs due to carbon pricing mechanisms (carbon taxes, etc.) and increasing regulations
Technologies	 More new business opportunities due to the development and proliferation of renewable energy sources, electric vehicles and other new technologies or alternative products Obsolescence of products and services that rely on older technologies
Markets	Shifting demand from fossil-fuel products and services to low-carbon products and services

Physical Risks

Increase in Unusual Weather Patterns	Risks of water shortages, floods and other resulting phenomena having an adverse impact on business operations
Climate Change	• Risk of rising temperatures, etc. having an adverse impact on agricultural and marine products

* The impacts of the above risks and opportunities will depend on both the relevant regions and products.

* With respect to physical risks, it is important to consider environmental changes (or possibilities thereof) on a region-by-region or product-by-product basis. Accordingly, MC's responses to phenomena such as floods and water shortages are tailored to the on-the-ground characteristics and needs of each of its businesses.

Environmental

Social

Climate change

Transitioning to a Low-Carbon Society

MC has identified "Transitioning to a Low-Carbon Society" is a Key Sustainability Issue (Materiality), under which one of the company's strategies is to engage in the five business areas below.

Main Business Initiatives

Renewable energy and businesses that support the proliferation of renewable energy, including energy transmission and storage-related projects
 Low-emission natural gas projects
 Copper projects which support electric vehicles and other green technologies that are expected to grow in the future

Scenario Analyses

MC's businesses, including those described above, could be greatly affected if countries around the world tighten their restrictions on greenhouse gas emissions. Since fiscal year 2015, MC has been using a number of scenarios (including the IEA's 2°C Scenario*) to analyze the impact that such changes will have on its fossil-fuel operations, which have a significant financial impact on the Company. So far, those analyses have concluded that even in the 2°C Scenario, MC's fossil-fuel operations will remain competitive, and that the Company will remain resilient over the medium to long term due to its initiatives in other businesses where future market growth is anticipated owing to the spread of renewable energy and other businesses associated with the transition to a low-carbon society.

* IEA (International Energy Agency) Sustainable Development Scenario

Among the methods employed by MC in these analyses are product-based cost curves, through which the company can confirm product outlooks in each scenario, consider qualitative factors such as contractual terms, product quality and location, and evaluate cost competitiveness.

Cost-Curve Valuation Analysis





Climate change

MC's Awareness of the Medium to Long-term Business Environment and Related Initiatives

MC's awareness regarding the business environment in the medium to long-term as well as initiatives corresponding to different scenarios, specifically with regard to main business areas that could possibly be affected by climate change, are as follows.

Considering changes to the business environment under two scenarios, the base-case scenario, which accounts for each country's current reductions commitments (the NDC^{*1} Scenario), and the 2°C Scenario, MC is engaging in initiatives to explore opportunities and improve the resiliency of its businesses.

*1 Nationally Determined Contributions. Greenhouse gas (GHG) reduction commitments submitted by each country to the United Nations.

Global Supply and Demand

The trajectory forecast from the present until 2030 for the global supply and demand of energy under each scenario in publications such as the IEA's World Energy Outlook and Energy Technology Perspectives is expressed in five levels^{*2}. The level of impact varies depending on the region and other factors.

*2 Largely increase / increase / flat / decrease / largely decrease

Power Generation and Related Businesses

Awareness of the business environment under the NDC Scenario	Awareness of the business environment under the 2°C Scenario
Thermal power ^{*3} Renewables	Thermal power*4 Renewables
 *3 Demand trajectory and trends related to thermal power differ depending on fuel type, generation method and country/region. 	*4 Based on the Sustainable Development Scenario of the IEA World Energy Outlook 2017.
With the introduction of government subsidies and technological advancements, opportunities are anticipated for businesses such as renewable energy and clean gas-fired power generation. However, given the nature of power generation being produced locally for local consumption, MC feels it is important to continue managing businesses by responding to the policies, etc. of each country and region. For thermal power generation, business opportunities for gas-fired power, which has a lower environmental impact, are also anticipated to increase. The demand from Asia for LNG and demand in North America for natural gas are expected to grow. With regard to renewable energy, as the expansion of renewables progresses together with the proactive deployment of renewable technologies in Europe, with a focus on offshore wind, the grid configuration and supply of power will change. As a result, opportunities are anticipated for energy transmission and businesses that regulate the supply and demand for power such as battery storage and VPP (virtual power plant) businesses.	Under a 2°C Scenario, it is believed that policies to capture renewable energy as a main power source will become mainstream. It will be necessary to promote deregulation and technological innovation to construct an energy system that is not only sound environmentally, but economically and socially as well. Regarding this point, MC understands the need for multifaceted initiatives involving technologies that support the expansion of renewable energy while maintaining safe and stable supplies of power (energy storage, hydrogen, transmission technology and energy trading). Furthermore, MC recognizes that trends towards decentralization of the energy system driven by the spread of renewable energy, batteries and other technologies along with movements around thermal power generation, including next-generation types, may vary greatly in terms of timing and content depending on the status of government regulation and technological innovation, as well as the country or region.

Disclaimer regarding scenarios

Scenarios are based on past data and are not forecasts. Instead, they are virtual models based on possible outcomes for matters with high levels of uncertainty. The scenarios and awareness of business environment written here represent MC's understanding of the main scenarios disclosed by international organizations such as the IEA, and do not represent MC's medium to long-term outlook. Outlooks for possible outcomes in the medium to long-term take into account a number of potential risks, uncertainties and assumptions, and in actuality, may differ significantly from each scenario due to fluctuations of key factors.

Policies / Initiatives

In line with the expansion of renewable energy and accompanying policies, MC will optimize its portfolio throughout the electric power value chain while taking into account the characteristics of each country and region.

As of the end of September 2018, electricity generation capacity in operation worldwide on a net equity basis is approximately 5.7 GW, and the length of transmission cables in the power transmission business has reached a cumulative total of roughly 1,000km (with about 5 GW transmission capacity).

In the thermal power generation business, in addition to facilitating collaboration between its gas-fired power generation business, which uses a fuel source with a lower environmental footprint, and its upstream natural gas business, MC is also strengthening its power trading function. Furthermore, in Japan, MC is promoting comprehensive energy-efficient electric power supply businesses (on-site cogeneration business) for local communities and manufacturing plants. In line with "Transitioning to a Low-carbon Society", MC is taking steps such as converting to alternative fuel sources and raising the percentage of biomass co-combustion at existing coal-fired power plants. Furthermore, MC has adopted a policy to not enter into any new coal-fired power generation businesses, with the exception of projects which MC has already commenced development, and to aim to reduce MC's coal-fired power generation capacity on a net equity basis based on 2°C scenario analyses.

In the renewable energy business, in addition to aiming to achieve at least 20% renewable energy in its power generation business (by 2030, based on generation amount), MC is promoting businesses that support the proliferation of renewable energy, including energy transmission and storage-related businesses.

In Europe, where the active deployment of renewable energy continues to progress, all of MC's power generation activities involve renewable energy, with a focus on offshore wind. Moreover, MC proactively engages in new business opportunities including a virtual power plant (VPP) business that utilizes Lawson convenience stores as well as an off-grid distributed renewable energy project in Africa.

Furthermore, for the trading of components, MC has a policy to use best available technology (BAT) to the extent possible.

Reference: Environmental Business Section- List of Renewable Energy Projects

Natural Gas / LNG



*Figures are based on the Sustainable Development Scenario of the World Energy Outlook 2017.

Policies / Initiatives

MC has pioneered the promotion of its environmentally-friendly LNG business and supported the stable supply of LNG to markets mainly in Japan. After the first introduction of LNG into Japan in 1969, in addition to its initial role as buyers' agent, MC has made a wide range of investments into businesses from upstream to downstream in the natural gas value chain. Moreover, by participating in an LNG project as project operator, and by selling LNG through its subsidiary company, MC has been expanding its function in the natural gas supply chain. In 2017, LNG production from projects in which MC has invested represent 30% of the global share, and its exports of LNG to Japan in particular have reached roughly 55%. Furthermore, in October 2018, MC, together with its project partners, made a final investment decision in LNG Canada, bringing MC's LNG project total to 13 in eight countries worldwide (MC's share of production capacity in existing projects is approximately 8 million tons/year, and in projects currently under construction is approximately 6.5 million tons/year).

Meanwhile, in order to further strengthen its natural gas value chain, MC has been seeking to create demand for LNG by investing in energy infrastructure in Asian developing countries and by marketing LNG as marine fuel.

By generating demand and by building a competitive portfolio through cost reductions, MC is promoting businesses that would steadily increase profits even in the event that demand flattens from 2030 under the 2°C Scenario.

Reference: LNG Project list (p42)

Thermal Coal (Fuel source for power generation)



Policies / Initiatives

From the perspective of satisfying energy demand, MC will continue to provide a stable supply through its trading business. From the standpoint of reviewing its business portfolio, MC sold a portion of its thermal coal assets (In the fiscal year ended March 2018 – Warkworth Coal Mine, in the fiscal year ending 2019 – Hunter Valley Operations Coal Mine), and plans to complete the sale of its remaining assets (Clermont and Ulan Coal Mines) going forward.

Reference: Press Release regarding the agreement to sell its interests in the Clermont and Ulan Coal Mines

Coking coal (raw material for steel-making)

Awareness of the business environment under the NDC Scenario	Awareness of the business environment under the 2 °C Scenario	
Firm demand growth for steel is anticipated, particularly in locations	While the share of electric furnace method steel making will increase	

such as India and Southeast Asia. Steel production is divided into the blast furnace method, which uses iron ore and coking coal, and the electric furnace method, which uses iron scrap as the raw material. With the blast furnace method predicted to continue to be the main method of producing steel going forward, the demand for coking coal is also expected to steadily increase. Although new technologies to replace the current blast furnace method are being researched, from an economic perpective the new technologies are not expected to be realized in the long-term, and it is believed that the blast furnace method will continue to be the main method of steel production. While the share of electric furnace method steel making will increase in accordance with the transition to a low-carbon society, the outlook for increased steel demand remains unchanged, and it is anticipated that demand will remain steady with a focus on emerging markets. Furthermore, under the 2°C Scenario, supply is expected to decrease as a portion of new coalmine projects may be delayed/cancelled due to a backlash against coal investment, so it is presumed that existing coalmines will gain a better relative advantage.

Policies / Initiatives

From the outlook that demand for coking coal will continue to expand steadily based on the demand for steel in the medium to long-term, MC will continue to fulfill its responsibility to provide customers with a stable supply of coking coal. In the BMA coking coal business in Australia, looking to promote the transition to a low-carbon society, MC is taking action to reduce greenhouse gases from production processes on the ground. In addition, MC is supporting technological research to reduce and capture CO_2 emissions emitted by coal through participation in initiatives such as Coal 21, comprised of each Australian coal-producing company.

Copper



Furthermore, in the event that carbon reductions progress faster than current forecasts, even greater demand can be expected for copper due to the anticipated increase in renewable energy and EVs.

* For the copper business, while demand is expected to increase under the 2°C Scenario, at present MC has not conducted a scenario analysis, and the business environment described above is a general perspective.

Policies / Initiatives

In addition to the business environment awareness stated above, since MC holds high-quality assets in terms of reserve volumes, quality and expansion capacity, MC conducts its copper business as one of the pillars of its mineral resource investment business. MC participates in four copper projects in Chile/Peru and retains a production share of approximately 200,000 tons/year.

In line with the above policies, MC increased its stake in the Quellaveco copper mine in Peru, which will become its fifth copper mining project. Quellaveco is one of the largest undeveloped copper mines in the world with high cost competitiveness, and it is expected to increase MC's production share by roughly an additional 120,000 tons/year.

Climate change

Future Actions

MC is currently performing high-level assessments of qualitative climate-change opportunities and risks through the process explained below. The purpose of these assessments is to comprehensively verify the impacts climate change will have on our businesses. MC is now planning to examine and determine the best ways to prioritize and monitor those businesses in which future climate-change action plans are most needed. These studies will take into consideration the impact that climate change is having on each industry.

Process of Assessing Climate Change Risks and Opportunities

(1) Identification of Climate Change Scenarios

MC will identify scenarios to objectively assess both new opportunities and the resilience of its businesses in cases where climate change causes significant deviations from business as usual (BAU).

Impact of Transition Risks	IEA 2℃ Scenario (WEO SDS Scenario, ETP 2DS Scenario, etc.)
Impact of Physical Risks	IPCC 4°C Scenario (government panel on climate change RCP8.5 Scenario, etc.)

(2) Identification of Businesses Most Affected by Climate Change

In addition to the industries in which MC is involved where both financial and non-financial factors (CO₂ emissions, water-usage amounts) have significant impacts, MC will specify those most affected by climate change taking into account the TCFD's sector classifications.


Environmental

Climate change

(3) Industry Impact Assessments

Transition Opportunities and Risks

Based on TCFD recommendations, MC is identifying climate-related opportunities and risks under the 2° Scenario at each link in its industry-specific value chains. The impact of climate change on each industry is assessed with respect to changing demand under the 2° Scenario (impact on demand), the impact on MC's businesses, and new business opportunities (impact on earnings).



Physical Risks

MC is assessing physical risks (water shortages, landslides, fires, etc.) in each region under the 4° C Scenario and the impact on businesses at each of its Group companies. With respect to assessing water risk, Aqueduct* and other outside tools are utilized based on information on water withdrawals at those companies.

* Aqueduct: World Resource Institute's water risk mapping tool

(4) Future Actions

Based on the results of MC's industry impact assessments, we will verify how the identified risks and opportunities are likely to affect our businesses and examine ways to optimize future strategies, risk management, and monitoring (such as by specifying which indicators to use and targets to set).

Industry Impact Assessment Criteria

Opportunities: Resource efficiency, energy resources, products, markets, resilience

Transition Risks: Government policies and laws, technologies, markets, reputation

Physical Risks: Acute, chronic Environmental

Climate change

Risk Management

MC regularly assesses which climate-related opportunities and risks warrant the most attention through both internal and external surveys, and makes official determinations at the Sustainability & CSR Committee, which consists of Group CEOs from each of MC's Business Groups. The specified opportunities and risks are managed under MC's sustainability promotion framework from two perspectives: Strategic Planning and Project-by-Project Business Management.



Screening Process for Loan and Investment Proposals

When reviewing and making decisions on loan and investment proposals, MC has adopted a process in which the Investment Committee deliberates all proposals to be discussed by the Board of Directors and the Executive Committee. The Corporate Functional Officer for Business Investment Management and Corporate Sustainability serves as the chairman of the Investment Committee, which comprehensively considers the loan and investment proposals.

By having the Corporate Sustainability Department take part in Investment Committee meetings as a committee member, MC has put in place a screening process to facilitate decision-making that takes into account environmental and social impacts. Besides screening new and exit proposals, the Investment Committee also strives to help make improvements to existing business investees by monitoring their management practices.

From the perspective of climate change-related transition opportunities and risks, review of proposals and decision-making takes into consideration quantitative data such as greenhouse gas emissions as well as national policies and industry trends.



Screening Process for Loan and Investment Proposals

Reference: For information on measures to address various ESG-related risks, please see the risk management information provided in each section.

Climate change

Metrics and Targets

MC has set the following climate-related targets to capitalize on opportunities and mitigate risks on a consolidated basis.

Target 1: Greenhouse Gas Emissions Reduction

Reduce emissions*1 per total assets*2 by 25% by 2030

- *1 Compared to fiscal year ended March 2017 levels. Greenhouse gas emissions on a consolidated basis (MC on a non-consolidated basis plus subsidiaries)
- *2 The total assets used for this target represent the numerical values within the emissions reporting calculation range, which differ from the total assets reported in MC's financial reports.

Target 2: Renewable Energy

By 2030 aim to achieve at least 20% renewable energy in MC's power generation business (based on generation amount)

Reference: For related data, please see this chapter's Performance and Additional Reference Data sections, the Environmental Business section and the Water Resources section.

Initiatives

Initiatives to Reduce Greenhouse Gas Emissions

MC sets greenhouse gas reduction targets on a consolidated basis and works with MC Group companies on emissions reduction initiatives. Each of MC's Business Groups (including the Corporate Staff Section) establish their own emission reduction plans utilizing EMS (Environmental Management System), thereby ensuring that measures to reduce emissions are uniquely tailored to each business.

MC will continue to confirm progress on a regular basis, make policy improvements, and share best practices.

Initiatives to Mitigate Environmental Impact Through Businesses

Reference: Please refer to the Environmental Business section.

Climate change

Climate Adaptation Measures in Salmon Farming Operations

Salmon farming company Cermaq, a 100% subsidiary of MC, assesses climate change adaptation as an important aspect of its risk management. Climate change has the potential to significantly impact the salmon farming industry, and risks related to e.g. extreme weather conditions and natural events are assessed as high risk areas. Climate change impacts may also affect Cermaq's feed supply due to a decrease in agricultural production, changes in forage fisheries, replacement of species or changes in amount of inclusion. Cermaq is working with feed suppliers to encourage climate friendly feed solutions and production of oils rich in omega-3 fatty acids from novel sources to build resilience.

Risks connected with extreme weather events are mitigated through applying site-specific risk assessments for elements such as weather patterns and temperatures, and implementing specific protocols and climate change adaptation measures. Changes to sea water surface temperatures are closely monitored to assess risks to fish health and welfare, including changes in oxygen levels or presence of pathogens. Climate change risks are in general mitigated by the geographic diversity of Cermaq's operations. Evaluating further expansion potential as a consequence of climate change is a part of the management's strategy reviews.

Furthermore, Cermaq engages actively in research and innovation for the development of new farming technologies, closed cage solutions, environmental monitoring and vaccine development as part of measures to adapt to increasing climate change risks.

Reference: Cermaq's website

https://www.cermaq.com/wps/wcm/connect/cermaq/ cermaq/our-company/annual-report/sustainability-report-17/management-approach-17

https://www.cermaq.com/wps/wcm/connect/cermaq/ cermaq/our-sustainable-choice/research-and-innovation/

Participation in Low-Carbon Society Promotion Campaigns

MC participates in the Japanese Ministry of the Environment's "Fun to Share" and "Cool Choice" campaigns, promoting emission reduction initiatives internally and disclosing the details widely.





MC Awarded 2018 Minister of the Environment's Commendation for Activities Aimed at Preventing Global Warming

As part of our efforts to address our Key Sustainability Issue "Transitioning to a Low-carbon Society", in addition to providing solutions through our business activities, we have also made efforts with regard to tropical rainforest regeneration and coral reef conservation. Recently, these efforts were recognized by Japan's Minister of the Environment, who awarded MC the 2018 Commendation for Activities Aimed at Preventing Global Warming in the "International Contributions" category.

Since MC launched short-term regeneration afforestation trials in Malaysia's tropical rainforest in 1990, the company has planted more than 1.45 million trees in Malaysia, Kenya, Brazil and Indonesia. Furthermore, since 2005 MC has participated in research projects involving industry, academia and NGOs to conserve coral reefs in Okinawa, the Seychelles and Australia.



* This commendation is part of the Ministry of the Environment's efforts to combat global warming, and is presented every December in observance of Japan's Global Warming Prevention Month to individuals or organizations that have taken notable strides in addressing climate change.

External Collaboration

Collaboration with Various Organizations

MC recognizes the necessity of collaborating with a wide range of stakeholders including government, companies and industry associations in order to achieve the transition to a low-carbon society. Accordingly, the Company proactively participates in a number of initiatives with external stakeholders.

Industry Groups:	When assessing whether to join or continue membership with an industry group, MC confirms whether the group's initiatives related to climate change are consistent with MC's Basic Policy on Climate Change. Through active participation in the discussions of climate change working groups, with a focus on organizations including the Japan Business Feder- ation (Keidanren), the Japan Foreign Trade Coun- cil and the World Business Council for Sustainable Development (WBCSD), each of which MC is a member, MC is promoting initiatives to contribute to the transition to a low-carbon society.
Government/ Public Office:	MC supports initiatives that contribute to a low-carbon society such as the expansion of renewable energy, the development and imple- mentation of next-generation technologies such as CCUS and hydrogen, as well as increased disclosure of ESG information, including about climate change. MC participates in training seminars and also engages in individual meetings and discussions on topics related to initiatives backed by Japa- nese government bodies including the Ministry of Economy, Trade and Industry and the Ministry of the Environment such as expanding utilization of the TCFD guidelines and renewable energy usage.

Reference: CDP Climate Change 2018 Response * Please refer to C12.3

Responding to CDP

MC actively disseminates information regarding its measures related climate change to its various stakeholders around the world.

The Company engages with CDP, an NGO which holds the world's largest database of corporate disclosures on climate change initiatives, and since the fiscal year ended March 2004, MC has responded to the CDP Climate Change Questionnaire, which is used for evaluating the climate change management of companies. For further information, refer to MC's CDP Climate Change 2018 Response.

Reference: CDP Climate Change 2018 Response

Performance

Environmental Performance (non-consolidated)

	2016.3	2017.3	2018.3
CO ₂ Emissions* ² (Unit: thousand t-CO ₂)	15.8	18.8	16.5*
Energy Consumption*3 (Unit: GJ)	373,805	346,170	305,339*
Electricity Consumption (Unit: MWh)	31,764	28,682	24,724*
CO2 Emissions from Logistics*3 (Unit: thousand t-CO2)	57	57	50*

Scope of Aggregation (non-consolidated):

• CO2 emissions, energy consumption, electricity consumption and CO2 emissions from logistics: Head Office, domestic branches and offices, data centers, training centers and other facilities

Environmental Performance (consolidated)

		2017.3	2018.3
CO ₂ Emissions	*1*2 (Unit: thousand t-CO ₂ e)	10,019	8,138*
CO ₂ emissions	per total assets *1*2*4 (Unit: million t-CO2e/trillion yen)	0.79	0.63
Components	Scope 1 emissions (excluding 6.5 gases)*1*2 (Unit: thousand t-CO2)	4,639	4,474*
	Scope 1 emissions (6.5 gases only)*1*2 (Unit: thousand t-CO ₂ e)	1,553	1,154*
	Scope 2 emissions*1*2 (Unit: thousand t-CO2)	3,827	2,510*
Energy Consur	nption (Unit: GJ)*1	92,607,818	70,682,146*
Electricity Con	Electricity Consumption (Unit: MWh)*1		4,291,996*

Scope 1 Emissions Data for Greenhouse Gases (6.5 gases) *1*2 other than CO₂ from Energy Sources from Business Activities

	(Unit: thousand t-CO ₂ e)		
	2017.3	2018.3	
	1,553	1,154*	
Carbon dioxide (CO ₂)	53	77*	
Methane (CH ₄)	1,500	1,077*	
Nitrous oxide (N ₂ O)	0.1	0.001*	
Hydrofluorocarbons (HFCs)	0	0*	
Perfluorocarbons (PFCs)	0	0*	
Sulphur hexafluoride (SF ₆)	0	0*	
Nitrogen trifluoride (NF3)	N/A	N/A	
	Methane (CH ₄) Nitrous oxide (N ₂ O) Hydrofluorocarbons (HFCs) Perfluorocarbons (PFCs) Sulphur hexafluoride (SF ₆)	2017.3 1,553 Carbon dioxide (CO2) 53 Methane (CH4) 1,500 Nitrous oxide (N2O) 0.1 Hydrofluorocarbons (HFCs) 0 Perfluorocarbons (PFCs) 0 Sulphur hexafluoride (SF6)	

Emissions by Segment

(U	Init: thousand t-CO2e
	2018.3
Global Environmental & Infrastructure Business Gr	oup 1,803
Industrial Finance, Logistics & Development Group	67
Energy Business Group	631
Metals Group	2,998
Machinery Group	30
Chemicals Group	395
Living Essentials Group	2,200
Corporate Staff Section	17

Scope of Aggregation (consolidated):

- CO₂ emissions, emissions of 6.5 gases, energy consumption: parent company and consolidated subsidiaries
- *1 Effective from the fiscal year ended March 31, 2017, emissions from projects with high communality, including power generation and heat generation (utility business), as well as joint operations (jointly managed projects), were included in the calculations. Furthermore, while emissions from franchises are generally not included in Scope 1 and 2 emissions, MC includes such emissions in cases where it is deemed appropriate for such emissions to be managed as part of MC's emissions, taking into account the relationship with the relevant company.
- *2 The following metrics were adopted as the basis for calculating greenhouse gas emissions.
 - Direct CO₂ emissions from fuel consumption
 - The Greenhouse Gas Protocol (GHG Protocol) "Emission Factors from Cross Sector Tools (Mar 2017)" (WRI/WBCSD)
 - Scope 1 Emissions Data for Greenhouse Gases (6.5 gases) other than CO₂ from Energy Sources from Business Activities Greenhouse Gas Emission Calculation and Reporting Manual (Version 4.2) (July

2016, Ministry of the Environment and Ministry of Economy, Trade and Industry) (Please refer to the Company's website for calculation standards : http://www.mitsubishicorp.com/jp/en/csr/management/pfm.html)

- Indirect CO2 emissions from electricity consumption, etc.
- Emissions coefficients by country for the fiscal year ended March 2015 from IEA CO₂ Emissions from Fuel Combustion (2016 edition) (Please refer to the Company's website for calculation standards : http://www.mitsubishicorp.com/jp/en/csr/management/pfm.html)
- *3 Data collected in compliance with the Act on the Rational Use of Energy in Japan. Logistics figures cover domestic (Japan) transport where MC is the cargo owner.
- *4 MC adopted a policy which aims to reduce greenhouse gas (GHG) emissions per total assets by 25% compared to fiscal year ended March 2017 levels by 2030. The total assets used for this target represent the numerical values within the emissions reporting calculation range, which differ from the total assets reported in MC's financial reports.

Independent Practitioner's Assurance

To enhance the reliability of its data, MC has obtained the assurance of Deloitte Tohmatsu Sustainability Co., Ltd., an independent practitioner, for its environmental performance data*. * In order to enhance data reliability, ESG Data marked with a star (*) for the year ended March 2018 has received independent practitioner's assurance from Deloitte Tohmatsu Sustainability Co., Ltd.

Reference: Independent Practitioner's Assurance Report (P161)

Additional Reference Data

Equity Share of Oil and Gas Upstream Production

MC's equity share of oil and gas upstream production is as shown below. Burning natural gas results in relatively lower GHG emissions compared to other fossil fuels, and demand for natural gas is forecast to continue to increase in line with the transition to a low-carbon society. Accordingly, MC has positioned natural gas as a core business. Currently, natural gas accounts for approximately 80% of the Company's equity share of oil and gas production.



Equity Share of Oil and Gas Upstream Production (Annual Average)*1

MC's Reserves (2P *3)

(100 million barrels per day) (As of the end of December 2017) A total of 1.97 billion barrels *1*2



*1 Includes oil equivalent and consolidated subsidiar-

ies and equity-method affiliates *2 Participating interest equivalent. Includes reserves

based on original standards set by MC

*3 Confirmed reserves + estimated reserves

Involvement in LNG Projects

Existing Projects in Production

Project	Beginning of Production			on)	Buyer	Seller	Shareholding	MC's Participa-	Business Contribution* ²
		Total	MC'	's share				tion	contribution
Brunei	1972	7.2	1.8	25%	JERA, Tokyo Gas, Osaka Gas, etc.	Brunei LNG	Brunei Gov. (50%), Shell (25%), MC (25%)	1969	ABCD
Malaysia I (Satu)	1983	8.4	0.42	5%	JERA, Tokyo Gas, Saibu Gas	Malaysia LNG	Petronas (90%), Sarawak Gov. (5%), MC (5%)	1978	ABCD
Malaysia II (Dua)	1995	9.6	0.96	10%	Tohoku Elec., Tokyo Gas, Shizuoka Gas, Sendai City Gas Authority, JXTG Holdings, Korea Gas, CPC	Malaysia LNG	Petronas (80%), Sarawak Gov. (10%), MC (10%)	1992	ABCD
Malaysia III (Tiga)	2003	7.7	0.31	4%	Tohoku Elec., Tokyo Gas, Osaka Gas, Toho Gas, JAPEX, Korea Gas, Shanghai LNG	Malaysia LNG Tiga	Petronas (60%), Sarawak Gov. (25%), JXTG Holdings (10%), MC (4%), JAPEX (1%)	2000	ABCD
North West Shelf	1989	16.9	1.41	8.33%	Tohoku Elec., JERA,Tokyo Gas, Shizuoka Gas., Toho Gas, Kansai Elec., Osaka Gas, Chugoku Elec., Kyushu Elec., Guandong Dapeng LNG	NWS JV	Shell, BP, BHP, Chevron, Woodside, MIMI [MC/Mitsui & Co.=50:50], 1/6 respectively	1985	A B C D
Oman	2000	7.1	0.197	2.77%	Osaka Gas, Korea Gas, Itochu Corp., BP	Oman LNG	Oman Gov. (51%), Shell (30%), Total (5.54%), MC (2.77%) etc.	1993	ABCD
Qalhat	2005	3.3	0.133	4%	Osaka Gas, MC, Union Fenosa Gas (Spain)	Qalhat LNG	Oman Gov. (47%), Oman LNG (37%), Union Fenosa Gas (7%), Osaka Gas (3%), MC (3%) etc.	2006	ABCD
Russia Sakhalin II	Oil: 2008 (year-round production), LNG:2009	9.6	0.96	10%	JERA, Tokyo Gas, Kyushu Elec., Toho Gas, Hiroshima Gas, Tohoku Elec., Saibu Gas, Osaka Gas, Korea Gas, Shell, Gazprom	Sakhalin Energy	Gazprom (50%+1share), Shell (27.5%-1share), Mitsui & Co. (12.5%), MC (10%)	1994* (*PSA conclu- sion)	A B C D
Indonesia Tangguh	2009	7.6	0.75	9.92%	Tohoku Elec., Kansai Elec., SK E&S, POSCO, Fujian LNG, Sempra Energy, etc.	Tangguh JV	BP (40.3%), MI Berau [MC/INPEX=56:44] (16.3%), CNOOC (13.9%), Nippon Oil Exploration Berau (12.2%) etc.	2001	ABCD
Indonesia Donggi - Senoro	2015	2.0	0.9	44.9%	JERA, Korea Gas, Kyushu Elec., etc.	PT. Donggi- Senoro LNG	Sulawesi LNG Development Limited [MC/Korea Gas=75:25] (59.9%), PT Pertamina Hulu Energi (29%), PT Medco LNG Indonesia (11.1%)	2007	ABCD
Wheatstone	2017	8.9	0.28	3.17%	Chevron, KUFPEC, Woodside, Kyushu Elec., PEW	Equity Lifting*1	Chevron (64.136%), KUFPEC (13.4%), Woodside (13%), Kyushu Elec. (1.464%), PEW (8%; of which MC holds 39.7%)	2012	ABCD

*1 LNG is procured and sold by each company according to the ratio of interest / equity in the liquefaction contract.

Projects under Construction

Cameron	2019	12.0	4.0	33.3%	MC, Mitsui & Co., Total (Toller)	Equity Lifting*1	Sempra Energy (50.2%), Japan LNG Investment (16.6%, of which MC holds 70%), Mitsui & Co. (16.6%), Total (16.6%)	2013	ABCD
Indonesia Tangguh (Expansion)	Mid 2020	3.8	0.38	9.92%	PLN, Kansai Elec.	Tangguh JV	BP (40.3%), MI Berau [MC/INPEX=56:44] (16.3%), CNOOC (13.9%), Nippon Oil Exploration Berau (12.2%) etc.	2001	ABCD
LNG Canada	Mid 2020's	14.0	2.1	15%	Shell, Petronas, PetroChina, MC, Korea Gas	Equity Lifting*1	Shell (40%), Petronas (25%), PetroChina (15%), MC (15%), Korea Gas (5%)	2010	ABCD
	Total	29.8	6.48						

*2 Business Contribution: 🗛 Investment in exploration & development (upstream), 🖪 Investment in liquefaction plant, 🤆 Marketing and/or import agent, D Shipping

Water Resources

Water Resources

Water is essential for human activity, circulating around the planet while changing to and from solid, liquid and gaseous states. 70% of the Earth's surface is covered with water, and of that amount, 97.5% is salt water. The remaining 2.5% is fresh water which supports human activity, including business activities. However, about three-quarters of that remaining fresh water exists in a frozen state such as within glaciers. Therefore, the amount of freshwater that is actually available for human use accounts for not even 1% of the Earth's total amount of water. Under the United Nations' Sustainable Development Goals (SDGs), the world is striving to secure access to safe drinking water for all people. At the same time, each country is working to achieve more prosperous livelihoods, including access to water, through economic initiatives that include business activities. Since economic scale and water consumption are closely correlated, companies must use water, one of the Earth's precious natural resources, in an efficient and appropriate manner while also aiming to solve challenges related to water issues through their businesses.

Policy

MC has clarified its intention to promote the "sustainable use of natural resources including water" in its Environmental Charter, which was first established in 1996 and later revised in 2010. The MC Group, which engages in a wide range of businesses worldwide, recognizes water as an essential element for its business activities and places critical importance on the sustainable use of water in all of its operations. In particular, MC identifies relevant risks and opportunities in a timely manner and, with the goal of achieving the sustainable use of water, establishes appropriate water consumption, recycling and reuse rates throughout its operations and makes efforts to improve use efficiency and reduce consumption. Furthermore, MC will contribute to the resolution of global water issues by establishing water infrastructure businesses and developing comprehensive water operations that contribute to solving water issues.

Targets

Aiming to reduce the consumption of limited water resources, MC will set a target for reducing water consumption at its Head Offices from the fiscal year ended March 2019 and make efforts to reduce consumption.

MC also conducts a sustainability survey which aims to track

the withdrawals, discharges and recycling of water for the total operations of its portfolio investment companies. In addition to achieving a 100% response rate for this survey, MC is conducting an analysis of individual increases and decreases of the various surveyed items.

Structure

Officer in Charge	Iwao Toide (Member of the Board, Executive Vice President, Corporate Functional Officer, Business Investment Management, Corporate Sustainability, Al/IoT)
Deliberative Body (A subcommittee under the Executive Committee, a management decision making body)	Sustainability & CSR Committee Important matters related to water resources deliberated by the Sustainability & CSR Committee are formally approved by the Executive Committee and put forward or reported to the Board of Directors based on prescribed standards.
Department in Charge	Corporate Sustainability Dept.

Reference: Diagram of the Sustainability Promotion Framework (P.07)

Risk Management

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 a water resources perspective, MC has set up a screening process for decision-making that first confirms compliance with environmental regulations related to such factors as water discharge and withdrawals (confirmation of regulatory risks), as well as the impact of water withdrawals on surrounding communities and local society, and the impact of climate change on the fresh water environment (confirmation of physical risks). For this screening process, particularly for businesses in areas considered to have high levels of water stress, MC utilizes the World Resource Institute (WRI)'s Aqueduct tool in order to incorporate external perspectives. Besides screening new investment and exit proposals, MC also strives to make improvements to existing business investments by monitoring their management practices.

Initiatives

Initiatives to Maximize Water Efficiency (Los Bronces Copper Mine)

MC is involved in the copper mining business in countries such as Chile and Peru.

Since copper mining requires large amounts of water, MC encourages the introduction of technologies to maximize the water efficiency of each mine's operational processes and takes measures

to reduce new water withdrawals.

The Los Bronces copper mine project (located in Chile's capital province), in which MC invests together with Anglo American, achieved a water recycling rate of 70% in 2017 through measures such as extracting and recycling water from tailings.

Initiatives to Reduce Water Consumption (Escondida Copper Mine)

One of MC's major investments is the Escondida Copper Mine. This mine is located in the desert region of northern Chile, and boasts the largest production volume in the world. Water consumption is reduced in the process of mine selection and so forth through water-saving and reuse, among other means. Moreover, in 2017, approximately US\$3.4 billion was invested to complete construction of a new desalination plant with one of the largest processing and pumping capacities in the world. These measures are helping to reduce the amount of water taken from subterranean aquifers, which are an important water source for environmental protection and coexistence with local communities.

Water Resources

Initiatives to Reduce Water Consumption (Toyo Reizo Co., Ltd.)

Toyo Reizo Co., Ltd., one of MC's consolidated subsidiaries, has declared in its environmental policy that it will reduce the amount of water resources to be used in its production processes and will take preventative measures against the discharge of pollutants. It has also set targets to reduce water consumption on both a single fiscal year and mid-term basis to engage in reduction activities. In particular, the company aims to reduce its environmental impact by saving water. To achieve this, it calculates consumption and discharge amounts in plants and related facilities with high water consumption for daily assessment and review. In addition to these efforts to reduce water consumption, the company has also set targets for the reduction of CO₂ and waste discharge and for the implementation rate of food waste recycling, etc. while seeking continual improvements though a PDCA cycle.

Reference: Torei Environmental Report 2018, targets, data and initiatives (Japanese only): http://www.toyoreizo.com/outline/images/environmentreport2018.pdf

Water Consumption Reduction Initiatives (Olam)

Olam International Limited, an MC affiliate company, committed in 2013 to reducing water consumption across its agricultural and manufacturing activities, and in 2016 was able to reduce the amount of water used for irrigation and in factories by 31% from the previous year. Examples include implementing the Alliance for Water Stewardship (AWS) standard in its coffee plantation in Tanzania, the first such implementation for agricultural operations and the first in the Africa region. Through this implementation of AWS standards, Olam is strengthening water management to promote initiatives to preserve safe drinking water for over 300,000 people in surrounding communities.

In addition, Olam's long-term selective breeding program in the US to produce onions with higher solid content and lower water content, combined with a focus on optimizing irrigation in collaboration with the growers has achieved quantified savings of 19.1 billion liters of water consumption between 2009 and 2017. Moreover, through water stewardship programs in India's sugar cane production, around 62 billion liters were saved over 3 years from 2013.

Reference: To find out more about Olam's activities to reduce water consumption, please visit the following links on the company's website: Olam Priority Areas, Water https://www.olamgroup.com/sustainability/sustainability-framework/priority-areas/water.html

Initiatives in Water-Stressed Regions (Desalination Projects)

MC is delivering seawater desalination projects in drought regions of the world such as Atacama Desert in Chile and the State of Qatar in the Middle East which contribute to the alleviation of water stress in those regions. Northern Chile is facing serious depletion of groundwater, and alternative water sources are required in consideration of local communities and the agricultural industry. MC provides a stable supply of desalted water to mines and farmlands in the region on the basis of a BOO (Build-Own-Operate) contract. In Qatar, MC is delivering an Independent Water and Power Project that supplies 2,520,000 kWh of electricity and 620,000 tons per day of water (which comprises 25% of Qatar's desalination capacity) to Qatar General Electricity & Water Corporation over 25 years. MC is delivering the Project in cooperation with the Qatari government to fulfill growing demand for water associated with economic development and population growth and to contribute to the long-term development of the country.

Water Resources

External Collaboration

Responding to CDP

MC actively disseminates information about its ESG-related initiatives to its various stakeholders around the world.

The Company engages with CDP, an NGO which holds the world's largest database of corporate disclosures on climate change initiatives, and since the fiscal year ended March 2012, MC has responded to the CDP Water questionnaire, which evaluates corporate water management.

Participation in the Water Project of the Ministry of the Environment of Japan

MC participates in the Water Project*, a public-private initiative which promotes initiatives aimed at preserving or restoring healthy water cycles.

* The project was launched based on the Basic Act on Water Cycles in 2014. The Water Project was founded to build a public-private collaboration platform and to promote initiatives and self-motivated approaches from private sector companies aimed at achieving sound water cycles and water environment preservation.



MC is promoting activities, both through business and corporate philanthropy initiatives, to maintain and restore sound water cycles. The Company also disseminates information about its initiatives and the importance of water through internal and external communication.

Collaboration with NGOs

MC supports a wide range of initiatives focusing on environmental conservation, education and poverty alleviation in Europe and Africa through the Mitsubishi Corporation Fund for Europe and Africa (MCFEA) (Since 1992, more than 4,600,000 pounds have been funded). The MCFEA delivers support through various partner organizations including the Earthwatch Institute, SolarAid, Farm Africa and BirdLife International. One of these partners is the NGO WaterAid, which provides safe water and sanitation to people in dire need around the world in order to help greatly improve their health and quality of life.

Performance

Water Withdrawal

(Unit: thousand m³)

		Water withdrawal (2016.3 results)	Water withdrawal (2017.3 results)	Water withdrawal (2018.3 results)	Note
Non- consolidated:		40	40	41*	Mitsubishi Shoji Building, Marunouchi Park Building and certain other offices in Tokyo
Consolidated:		93,621	103,184	93,226	Non-consolidated and main domestic subsidiaries
-	Components are as follows:				
	Industrial water, water supply:	20,054	25,344	25,870	
	Groundwater:	12,175	11,185	12,507	
	Rivers/lakes:	23,109	21,856	21,901	
	Ocean:	38,276	44,795	32,944	
	Rainwater:	7	4	3	

Water Recycling Volume and Rate*

(Unit: thousand m³)

		2016.3 results			2017.3 results			2018.3 results		
	Water withdrawal	Recycling volume	Recycling rate	Water withdrawal	Recycling volume	Recycling rate	Water withdrawal	Recycling volume	Recycling rate	Note
Non- consolidated:	40	-	_	40	-	_	41*	_	-	Mitsubishi Shoji Building, Marunouchi Park Building and certain other offices in Tokyo
Consolidated:	93,621	10,477	10%	103,184	11,059	10%	93,226	10,204	10%	Non-consolidated and domestic subsidiaries

* Ratio of recycling volume to the total of amount of water withdrawal and recycling volume.

Reference: Water Discharge (P.50)

Independent Practitioner's Assurance

To enhance the reliability of its data, MC has obtained the assurance of Deloitte Tohmatsu Sustainability Co., Ltd., an independent practitioner, for its environmental performance data*.

Reference: Independent Practitioner's Assurance Report (P161)

^{*} In order to enhance data reliability, ESG Data marked with a star (★) for the year ended March 2018 has received independent practitioner's assurance from Deloitte Tohmatsu Sustainability Co., Ltd.

Biodiversity

Biodiversity

Policy

As stated in our Environmental Charter, MC recognizes the critical importance of what ecosystems can provide and is committed to protecting ecosystems and any potential impacts on biodiversity.

We have identified "Conserving the Natural Environment," which includes consideration of biodiversity, as one of the Key Sustainability Issues (Materiality) that we must actively take on in order to support sustainable growth for the company.

Reference: MC's Environmental Charter (P.02) Policy on Mine/Site Decommissioning (P.108)

Targets

MC strives to mitigate the impact that its businesses have on biodiversity, and seeks ways to contribute to ecosystem preservation through its businesses as well as through corporate philanthropy activities aimed at environmental preservation. Based on these policies and materiality analysis, MC aims to minimize negative impacts on biodiversity from its businesses. For example, we take biodiversity considerations into account when reviewing and making decisions on loan and investment proposals. In addition, we are engaged in corporate philanthropy activities aimed at conserving biodiversity, including the Tropical Forest Regeneration Experimental Project and the Global Coral Reef Conservation Project.

Regarding contributions to the preservation of ecosystems through our business activities, MC takes into account aspects related to biodiversity when screening new project and exit proposals, and also aims to make improvements by monitoring the management practices of existing business investments.

Structure

Officer in Charge	Iwao Toide (Member of the Board, Executive Vice President, Corporate Functional Officer, Business Investment Management, Corporate Sustainability, Al/IoT)
Deliberative Body (A subcommittee under the Executive Committee, a management decision- making body)	Sustainability & CSR Committee Important matters related to biodiversity deliberated by the Sustainability & CSR Committee are formally approved by the Executive Committee and put forward or reported to the Board of Directors based on prescribed standards.
Department in Charge	Corporate Sustainability Dept.

Reference: Diagram of the Sustainability Promotion Framework (P.07)

Risk Management

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. Since 2012, we have employed the Integrated Biodiversity Assessment Tool (IBAT) developed by organizations including the International Union for the Conservation of Nature (IUCN) to help assess potential business impacts by evaluating the status of protected or endangered species in the vicinity of project sites, along with other relevant data on special conservation areas. Besides screening new investment and exit proposals, MC also strives to make improvements to existing business investments by monitoring their management practices.

Biodiversity

Initiatives

Examples of Protection/Conservation Activities through Business Operations

Working to Safeguard the Natural Environment at the World's Largest Solar Salt Fields

Exportadora de Sal, S.A. de C.V. (ESSA), a salt manufacturer in which MC and the Mexican Government have equity interests of 49% and 51% respectively, operates the world's largest solar salt field in northwestern Mexico. ESSA supplies approximately half of the solar salt imported into Japan, and has also established a solid position as a company that supports Japan's chlor-alkali business, with the salt used as a raw material in PVC and caustic soda.

The salt fields are in the vicinity of Guerrero Negro, where a community has grown up around ESSA complete with schools, hospitals, shops, churches and other facilities. There is also a supermarket run by ESSA, and through the various jobs it creates, ESSA is further contributing to the stability of the local community.

ESSA has operations within the El Vizcaíno Biosphere Reserve, including facilities located near the Ojo de Liebre lagoon (a UNESCO World Heritage site that is a breeding ground for gray whales). Great care is taken at all times to respect the surrounding ecosystem, while minimizing any negative and maximizing positive impacts on biodiversity.

In September 2000, the region in which ESSA is situated was designated by the WHSRN^{*1}, a U.S.-based shorebird protection group, as a site of international importance ^{*2}, and in April 2009 the designation was upgraded to that of hemispheric importance^{*3}.

ESSA cooperates with the activities of WHSRN such as surveys of bird species in the salt fields and maintenance and protection of nesting sites. In addition, ESSA is working to protect the natural environment through the installations of approximately 200 roosts which protect birds from coyotes and other dangers.

ESSA's salt production activities are leading to the creation of new types of ecosystems. With a similar degree of salinity to the nearby lagoons, the evaporation ponds are home to many species of fish, crustaceans and birds. The 8,000 hectare ponds' high microorganism density allows them to generate the same amount of oxygen as would the same area of forest in Canada.

Under the three environmental policies of "Prevention of Air, Land and Ocean Pollution," "Conserving the Natural Environment" and "Biodiversity Monitoring," ESSA will continue to pursue sustainable development in harmony with the environment by engaging in ecosystem research and conservation activities, etc. together with a wide range of stakeholders including members of the local community, local government organizations, universities, and NGOs.

- *1 Western Hemisphere Shorebird Reserve Network
- *2 At least 100,000 shorebirds annually; OR at least 10% of the biogeographic population for a species
- *3 At least 500,000 shorebirds annually; OR at least 30% of the biogeographic population for a species

Details of Preservation and Conservation Activities

Key targets for ecosystem monitoring	The Baja California Pronghorn, gray whales, wild birds (approx. 140 species), sea turtles ESSA's environmental conservation team engages in ecosystem monitoring such as population studies (5–12 times per year) and seawater composition tests (24 times per year) in collaboration with PROFEPA (Federal Attorney of Environmental Protection of Mexico) and WHSRN.
Example of activities [1]	Establishment of a reserve to protect the endangered The Baja California Pronghorn in cooperation with Mexican environmental protection organization ENDESU and related breeding program (population of approx. 400 individuals within conservation area of about 23,000 ha; two conservation centers created)
Example of activities [2]	Periodic audits have been conducted (eight times per year) to estimate gray whale population in Ojo de Liebre and San Ignacio lagoons in collaboration with the National Commission of Natural Protected Areas (CONANP) and the Autonomous University of Baja California Sur (UABCS). These audits have determined the population is now higher than before the year 2000. There remains a medium- to long-term need to determine trends relating to the whale ecosystem and migration patterns.

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Biodiversity

Rehabilitation

Reference: Mine Closure Initiatives (P.113)

External Collaboration

Status of Participation in the Roundtable on Sustainable Palm Oil (RSPO) Participation

MC joined the RSPO in 2004 as the first Ordinary Member in Japan, and has set a goal to source 100% RSPO-certified sustainable palm oil or equivalent by 2021. Through collaboration and partnership with other RSPO member companies, MC is making efforts with regard to the sustainable sourcing and supply of palm oil.

Reference: RSPO ACOP Report https://www.rspo.org/members/69/mitsubishi-corporation

Status of Participation in the Round Table on Responsible Soy Association (RTRS)

Agrex do Brasil, an MC subsidiary, is an RTRS (Round Table on Responsible Soy Association) certified producer with a total of 26,000 hectares of land certified under this standard. Agrex do Brasil was the first agricultural company to obtain RTRS certification for the production of responsible soy in its farmland in Maranhão, Brazil. Through the RTRS certification, Agrex do Brasil seeks to make various internal improvements, increase efficiency in soil management and protection, improve water management, foster employee motivation and strengthen relationships with neighboring communities.

Participation in CDP

MC actively discloses information related to its efforts regarding ESG to a variety of stakeholders around the world. Since the fiscal year ended March 2015, MC has responded to CDP Forests, a survey which evaluates companies' forest management in the

Cermag Initiatives

Cermaq, an MC subsidiary, is a partner to the UN Global Compact Action Platform for Sustainable Ocean Businesss ('UN Ocean Platform'). Cermaq was the first patron to join this initiative in February 2018, with the goal of developing holistic global solutions for the sustainable use of the ocean. The first business-driven initiative of supply chain. CDP is an NGO which holds the world's largest database of corporate disclosures on climate change initiatives and other environmental data.

its kind in the United Nations, the initiative is working to develop roadmaps for the maritime industries in close dialogue with governments, academic institutions, NGOs and UN organizations.

Reference: Please refer to the Customer Responsibility Section for details on Cermaq's other initiatives.

Biodiversity

Examples of Collaboration with Government Bodies

Forest Conservation Project: Mitsubishi Corporation Thousand Year Forest (Also Known as Yataro's Forest)

In partnership with the local government, MC is undertaking a forest development project in Aki City, Kochi Prefecture, the birthplace of Mitsubishi founder Yataro Iwasaki.

The shrinking of the world's tropical forests has had a major impact on the global environment, including the effect on the conservation of natural ecosystems and the reduction in the absorption of CO₂ which contributes to global warming. MC has been engaged in the Tropical Forest Regeneration Experimental Project as part of its corporate philanthropy initiatives since 1990. From 2009, the Company has participated in the "Forest Conservation Project" in partnership with the local prefectural and city authorities and an NGO based in Eastern Kochi, in line with forest conservation agreements. The development of Yataro's Forest marks MC's first major forest development project in Japan.

Project aims include: conducting activities to preserve and improve forest ecosystem services such as water conservation, allowing MC employees and local people to gain hands-on experience and undertake volunteer activities, and utilizing the forest as a place for environmental education.

Examples of Collaboration with International Organizations and NGOs

MC's Global Coral Reef Conservation Project promotes cooperative research into coral reefs by industry (MC), academia and NGOs in three locations: Okinawa, the Seychelles and Australia. Major project partners include James Cook University in Australia and the Seychelles National Parks Authority, a semi-governmental entity.

The results of this research are published online and via international symposia to help evaluate the resilience of coral environments and preserve related biodiversity. This project has been recognized with a Medal of Honour in Japan, and has also been

Foundation and Fund Activities

Through the Mitsubishi Corporation Foundation for the Americas (MCFA) and the Mitsubishi Corporation Fund for Europe and Africa (MCFEA), MC is involved in efforts to eradicate poverty, tackle social and environmental protection issues and undertake related educational research across the Americas, Europe and Africa. Support is carried out with a wide variety of partner organizations such as Earthwatch Institute, which supports scientific environmental conservation research.

approved by the Japan Committee of the United Nations Decade of Biodiversity (UNDB-J)*. In addition, as an official sponsor of the International Year of the Reef 2018, MC is actively communicating the results of its Global Coral Reef Conservation Project, and has also participated in holding awareness raising events such as the Tokyo Coral Reef Café.

* A committee that seeks to achieve the Aichi Biodiversity Targets adopted at the Tenth Ordinary Meeting of the Conference of the Parties to the Convention on Biological Diversity (COP 10) held in Nagoya, Aichi Prefecture, Japan in 2010.

Reference: Please refer to the Community section for details on foundation and fund activities.

Biodiversity

Examples of Collaboration with Other Companies

In April 2015, MC joined the Japan Business Initiative for Biodiversity (JBIB)*, a group of firms committed to undertake joint research aimed at protecting biodiversity. The JBIB member firms agree to respect biodiversity in their daily business operations and pursue activities aimed at minimizing negative biodiversity impacts. Going forward, through communication with JBIB members and related initiatives, we will work to find ways of enhancing our initiatives toward protecting biodiversity.

* A group of Japanese companies engaged in biodiversity protection activities

Performance

Please refer to p119 of the Supply Chain Management section for information on certified products.

Results of Social Contribution Activities

Having started the Tropical Forest Regeneration Experimental Project in 1990, MC remains widely involved in forest conservation in Japan and overseas. Through the Tropical Forest Regeneration Experimental Project which aims to regenerate rainforests in a short period of time and the Global Coral Reef Conservation Project which strives to protect ocean biodiversity, MC's environmental conservation efforts stretch worldwide. As part of this, since the fiscal year ended March 2012, MC has planted one tree per person every six months for every shareholder who consents to receive important communications such as the Notice of the Ordinary General Meeting of Shareholders by e-mail rather than by post. In the fiscal year ended March 2018, MC planted 37,381 trees, for a cumulative total of 315,685 trees planted through this initiative.

Prevention of Pollution

Policy

MC recognizes the importance of striving to create and enhance environmental value, as stated in the Environmental Charter, by undertaking conservation activities and reducing our environmental footprint, including through the prevention of pollution.

Moreover, in terms of company-wide management of compliance with environmental laws, regulations, etc., MC takes responsibility as a business that produces waste. To ensure rigorous compliance with laws and regulations related to preventing pollution as well as the reduction, reuse and recycling of waste within the company, internal notifications are sent out, as well as announcements and alerts about meetings and other related events.

Furthermore, MC has formulated guidelines and standards for responding to oil spills and soil contamination and disseminates this information internally to ensure thorough understanding.

Reference: Mitsubishi Corporation Environmental Charter (P.02)

Targets

MC conducts an environmental performance survey for all MC Group companies in order to manage pollution prevention as well as waste reduction, reuse and recycling initiatives on both a non-consolidated and an MC Group-wide basis. On a

non-consolidated basis, we set and monitor specific reduction targets related to the volume of waste produced in conjunction with Head Office activities in order to reduce, reuse and recycle waste through operation of environmental management systems (EMS).

Item	2018.3 targets	2018.3 results	2019.3 targets
Pollution prevention	(Oil spill risk survey conducted biannually)	-	Conduct oil spill risk survey and confirm proper risk management system
Waste production ^{*1}	606.6 tons	563.6 tons	557.7 tons
	(± 0% from 2017.3 results)	(7.1% decrease from 2017.3 results)	(1.0% decrease from 2018.3 results)
Use of raw materials*2	50.49 million sheets	46.67 million sheets	46.2 million sheets
	(1.0% decrease from 2017.3 results)	(8.5% decrease from 2017.3 results)	(1.0% decrease from 2018.3 results)

*1 Waste produced: Waste produced in conjunction with Head Office activities

*2 Use of raw materials: Volume of copy paper used at the Head Office

Environmental

Social

Structure

Officer in Charge	Iwao Toide (Member of the Board, Executive Vice President, Corporate Functional Officer, Business Investment Management, Corporate Sustainability, Al/IoT)
Deliberative Body	Sustainability & CSR Committee
(A subcommittee under the Executive Committee, a management decision- making body)	Important matters related to preventing pollution deliberated by the Sustainability & CSR Committee are formally approved by the Executive Committee and put forward or reported to the Board of Directors based on prescribed standards.
Department in Charge	Corporate Sustainability Dept.

Reference: Diagram of the Sustainability Promotion Framework (P.07)

Risk Management

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 including pollution prevention as well as the reduction, reuse and recycling of waste. Besides screening new investment and exit proposals, MC also strives to make improvements to existing business investments by monitoring their management practices. Regarding oil spills in particular, oil spill risk surveys are conducted regularly, confirmations are made that oil spill accident prevention and risk management frameworks have been established, and training is conducted to ensure the thorough dissemination of information on these topics. Through these measures, MC is ensuring appropriate risk management to prevent oil spills from occurring.

Initiatives

Initiative to Reduce Waste Production (Non-Consolidated Basis)

<Office Management>

- Maintained recycling rate through rigorous separation of trash
- Planned management of office furniture

<Business Activities>

MC's environmental management systems are based on various laws and regulations and are compliant with various recycling laws (Food Waste Recycling Law, Container and Packaging Recycling Law, Home Appliance Recycling Law, Construction Material Recycling Law). MC manages its operations while following the procedures stipulated in each of these regulations, and strives to reduce waste production through its business activities.

Initiatives to Reduce Waste Production (Mitsubishi Shokuhin Co., Ltd.)

MC subsidiary Mitsubishi Shokuhin Co., Ltd. carries out various efficiency measures to optimize its supply chains through collaboration between the manufacturing, distribution and retail sectors. Working jointly with manufacturers and retailers to enhance logistics efficiency and collaborating with retailers to reduce product return rates and optimize inventory have led to reductions in greenhouse gas emissions and waste production.

The Council for the Collaboration between the Manufacturing,

Initiatives to Prevent Oil Spills

MC formulated its Oil Spill Risk Guidelines in 2012. On a Groupwide basis, the Company strives to prevent oil spills, giving due recognition of the environmental burden they could cause.

MC makes project decisions taking into account matters such as the products handled and location of the enterprise, conducts oil

Distribution and Sales Sectors awarded Mitsubishi Shokuhin with the 2017 Supply Chain Innovation Award in recognition of its excellence in striving to collaborate with the manufacturing, distribution and retail sectors toward optimization of the overall supply chain.

Reference: Mitsubishi Shokuhin press release (Japanese only) http://www.mitsubishi-shokuhin.com/170707_Release_ HP.pdf

spill risk surveys regularly, confirms that oil spill accident prevention and risk management frameworks have been established, and conducts training to ensure the thorough dissemination of information on these topics. Through these measures, MC is ensuring appropriate risk management to prevent oil spills from occurring.

External Collaboration

Marunouchi Ecoben Project

As an environmental initiative in the Marunouchi area, container collection boxes have been installed throughout the Mitsubishi Shoji Building Head Office in cooperation with Mitsubishi Estate Co., Ltd.'s Marunouchi Ecoben Project unifying tenants and workers by using, collecting and recycling recyclable lunchbox containers. MC strives for its employees to promote an understanding of recycling and to proactively engage in recycling activities.

Oil Terminal Business' Collaboration to Prevent Oil Spills

MC Group companies Onahama Petroleum Co., Ltd., Kanokawa Terminal Co., Ltd., and Namikata Terminal Co., Ltd. have entered into a firefighting and emergency response agreement with the Maritime Disaster Prevention Center (MDPC). Under this agreement, MC strives to impart knowledge of oil spill control to employees by, for example, regularly conducting drills on the prevention of marine disasters and providing training sessions for employees on topics such as the prevention of oil spills. These programs are applied to MC's business activities.

Prevention of Pollution

Performance

Toxic Waste Emissions

MC monitors production of specially controlled industrial waste under the Waste Management Law.

This includes infectious waste produced by the in-house clinic as well as waste PCB and PCB-contaminated items, etc. which are disposed sequentially within legally prescribed disposal periods.

			(Unit: kg)
	2016.3	2017.3	2018.3
Specially controlled industrial waste	7,780	7,930	8,739

All domestic subsidiaries and affiliates monitor and report appropriate figures under the Waste Management Law.

NOx, SOx, VOC Emissions

		(Unit: tor
		2018.3
Air pollutant emissions	NOx (Nitrogen Oxide)	647
	SOx (Sulfur Oxide)	182
	VOC (Volatile Organic Compounds)	3

Scope of aggregation: Consolidated (Non-consolidated and main domestic subsidiaries)

Reference: Waste Emissions (P61)

Efficient Use of Resources

Policy

Our daily lives depend greatly on plentiful global resources. MC believes it is important to simultaneously generate three kinds of value: economic value, societal value, and environmental value— while benefiting in a sustainable manner from limited resources within our planetary boundaries.

MC's Environmental Charter positions this as a key consideration in business activities by clarifying that we will promote the sustainable use of natural resources including energy, minerals, food stocks, wood and water throughout our global business operations. Specifically, MC strives to recycle, reuse, and efficiently use resources, reduce the ecological footprint of our business activities, maintain healthy stocks in fishing activities, and otherwise efficiently utilize resources in accordance with our business operations.

Reference: Mitsubishi Corporation Environmental Charter (P.02)

Structure

Officer in Charge	Iwao Toide (Member of the Board, Executive Vice President, Corporate Functional Officer, Business Investment Management, Corporate Sustainability, AI/IoT)
Deliberative Body	Sustainability & CSR Committee
(A subcommittee under the Executive Committee, a management decision- making body)	Important matters related to the efficient use of resources deliberated in the Sustainability & CSR Committee are formally approved by the Executive Committee and put forward or reported to the Board of Directors based on prescribed standards.
Department in Charge	Corporate Sustainability Dept.

Reference: Diagram of the Sustainability Promotion Framework (P.07)

Risk Management

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. This includes considering measures to address recycling and closed-loop businesses, waste management and related matters. Besides screening new investment and exit proposals, MC also strives to make improvements to existing business investments by monitoring their management practices.

Targets

MC has set a goal of achieving zero waste emissions offices*, with the aim of recycling at least 95% of the waste produced by the Company.

* MC defines "zero emissions" as cases where vendors are contracted to recycle 95% or more of waste produced by its Head Offices. MC also promotes waste reduction, reuse, and recycling, and manages Head Office activities with waste emissions targets.

	2018.3 targets	2018.3 results	2019.3 targets
Waste emissions	606.6 (tons)	563.3 (tons)	557.7 (tons)
	(\pm 0% from 2017.3 results)	(7.1% decrease from 2017.3 results)	(1.0% decrease from 2018.3 results)

Initiatives

Recycling and Closed-Loop Business Initiatives (Chuo Kagaku)

MC consolidated subsidiary Chuo Kagaku Co., Ltd. has been voluntarily collecting used plastic food containers from consumer co-ops, supermarkets and other organizations since 1990. Working closely with local service providers, the company promotes recycling at the regional level by selecting the most effective method after analyzing various options, and thus reducing its environmental burden.

In chemical recycling, containers are thermally decomposed using steelmaking equipment into basic chemical raw materials before being turned into plastic raw materials, some of which are recycled into food trays.

In thermal recycling, containers are broken down and solidified to create alternatives to fuels such as coal, and used as boiler fuel for power plants, paper companies, etc.

In materials recycling, containers are broken down, melted, and otherwise processed to be given new life as recycled products such as benches.

In the year ended March 2018, Chuo Kagaku recovered a total of 2,223 tons of used plastic food containers, and was also awarded a silver prize in the ECO MARK AWARD 2016 sponsored by the Eco Mark Office under the Japan Environment Association.

To further increase the functionality of plastic food containers, the company successfully developed safe PET containers using

recycled PET raw material. Chuo Kagaku is also focusing on research in areas such as heat-resistant materials to make cooking more efficient, as well as high performance long-life containers to help curb food waste and loss. The company is concentrating especially on eco-friendly materials that can be used safely with all types of food. One example of success in this area is the development of CHUO A-PETGREEN (C-APG), which has acquired ECO MARK certification. By utilizing recycled PET raw material as a raw material for PET containers, the company is able to make efficient use of precious resources. Its safety has also been ensured by meeting voluntary industry standards in conformance with the U.S. Food and Drug Administration (FDA). The product epitomizes the company's drive to resolve social issues pertaining to the environment and safety.

Going forward, Chuo Kagaku will continue striving to reduce and collect waste, as well as reduce and avoid the use of raw materials.

Furthermore, Chuo Kagaku has formulated environmental impact reduction plans every five years since 2006 and is forging ahead with environmental initiatives. In 2017, the company established the Third Five-Year Plan to Reduce Environmental Impact (2017–2021).

Chuo Kagaku Co., Ltd.'s Third Five-Year Plan to Reduce Environmental Impact (2017-2021)

Theme	Description of initiatives	Targets (for 2022.3)		
	Recycling in-house waste	• Promoting zero emissions activities by recycling in-house waste		
Reduction of waste	Promoting recycling and collection of used plastic food containers at stores	 Promoting local closed-loop recycling and collection of used plastic food containers at stores Practical use of closed-loop food packaging recycling 		
	Promoting education about and practice of the 3 Rs (reduce, reuse, recycle) via closed-loop recycling	Promoting awareness-raising activities within and outside of the company		

(Past Achievements)

(1) Recycling in-house waste

In the year ended March 2018, 92.3% (2,928 tons) of the 3,172 tons of waste produced within the company was recycled and effectively reused. Waste breakdown in order of volume is as follows: plastic waste, wastepaper, scrap metal, general combustible

materials, wood shavings, and waste oil. Plastic waste was generated by manufacturing plants. Additionally, waste including PET bottles, empty cans, wastepaper, and plastic materials such as polypropylene (PP), PET, and polyethylene (PE) are proactively recovered and separated by the relevant department the Head Offices to promote recycling.

Targeted Waste	20)17.3	20	2018.3		
Targeleu Waste	Waste (tons)	Recycling rate (B)	Waste (tons)	Recycling rate (A)	YoY change (points)	
Plastic waste	3,049	96.3%	2,592	93.9%	-2.4	
Wastepaper	256	99.0%	296	99.4%	+0.4	
Scrap metal	160	98.7%	110	91.8%	-6.9	
General combustible materials	76	24.8%	69	0.6%	-24.2	
Wood shavings	34	86.6%	91	96.7%	+10.1	
Waste oil	13	85.1%	13	80.9%	-4.2	
Total	3,587	95.0%	3,172	92.3%	-2.7	

(2) Promoting collection and recycling of used plastic food containers from stores

With the cooperation of consumers, retailers such as supermarkets, and packaging material stores, Chuo Kagaku collects used plastic food packaging at stores and employs a variety of recycling processes to transform such materials into usable resources again. Chuo Kagaku also fulfills its obligations as a manufacturer of plastic food containers under Japan's Containers and Packaging Recycling Law, with regard to recycling used plastic food containers collected by municipalities nationwide.

	2014.3	2015.3	2016.3	2017.3	2018.3
Volume collected (tons)	3,197	2,560	2,484	2,566	2,546
Volume collected (converted to number of sheets)	799,250,000	640,040,000	620,910,000	641,540,000	636,370,000

* 4 grams equals 1 sheet

* "2014.3" is data for the 15 months from January 1, 2013 to March 31, 2014

Efficient Use of Resources

Recycling and Closed-Loop Business Initiatives (Livestock Feed Production Business)

Nosan Corporation, a consolidated subsidiary of MC, uses Eco Feed* as a raw material for its formulated livestock feed, with the aim of helping to increase the food recycling rate and enhance the livestock feed and food self-sufficiency rate. Currently, Nosan Corporation uses approximately 7,000 MT per year of dried Eco Feed recycled from discarded by-products of food production, unsold food products, leftovers from cooking etc., and approximately 20,000 MT per year of by-products from bakeries and confectionery factories (bread crumbs, cake flour). These are used as raw materials for livestock feed.

Going forward, Nosan Corporation plans to further increase the use of these raw materials in collaboration with the MC Group's retail companies.

Recycling and Closed-Loop Business Initiatives (Livestock Business)

Japan Farm Holdings Inc., a consolidated subsidiary of MC, is a large-scale livestock company which won the Fiscal 2016 Eco-Feed Award from the Japan Livestock Industry Association for its work building a closed-loop recycling model. The model is centered on reusing waste generated from a primary industry, specifically the lees left over from producing the distilled liquor shochu.

Japan Farm is located in Kagoshima Prefecture, which is famous for sweet potato shochu manufacturing. The by-product waste known

as lees from shochu manufacturing had been an ongoing issue. Japan Farm worked in collaboration with local distilleries for over two years to develop feed that reuses the shochu lees. The feed is used for breeding pigs that have been given the brand name of "Satsuma Koji Imo Buta." Along with reducing waste disposal costs and CO_2 emissions, a closed-loop model has been established in such a manner where the manure from the pigs given the feed is recycled into fertilizer sold by vendors such as local agricultural cooperatives.



^{*} A livestock feed manufactured using by-products of food production (by-products obtained from the food production process), unsold food products (bread and boxed lunches, etc.) leftovers from cooking (cut vegetable scraps and other leftovers from cooking) and residual farm products (imperfect farm produce, etc.).

Performance

Paper Consumption

			(Unit: Thousand sheets)
	2016.3	2017.3	2018.3
Paper consumption (A4 copy paper conversion)	58,554	55,908	51,196*

Scope of aggregation: Head Offices, six Japan-based branches and offices under each branch's jurisdiction

Water Discharge

				(Units: Thousand m ³)
		2016.3	2017.3	2018.3
Water discharge		45,465	47,505	46,062
	Rivers, lakes, etc.	15,834	15,748	15,808
	Groundwater	1,100	1,103	1,129
Water discharge (By destination)	Sea	26,953	29,303	27,576
(2) acountation,	External processing facilities	807	1,051	1,255
	Other	771	300	295

Scope of aggregation: Consolidated (Main Japan-based subsidiaries)

Reference: Water Withdrawal, Water Recycling Volume and Rate (P.47)

Waste Emissions

Consolidated Waste Volumes			(Units: Thousand tons)
	2016.3	2017.3	2018.3
General waste from business	12	193	221
Industrial waste	118	285	244
Total	130	478	465

Scope of aggregation: Consolidated (Parent company and main Japan-based subsidiaries)

Efficient Use of Resources

(Units: Ka)

(Units: kg)

Non-Consolidated Waste Volume (Head Office)

Non-Consolidated Waste Volume (Head Office)			(Units: kg)	
		2016.3	2017.3	2018.3
	Emissions volume	606,700	606,600	563,300
Wasta	Recycling volume	597,000	596,600	554,300
Waste	Waste volume	9,700	9,700	9,003
	Recycling rate (%)	98.4%	98.4%	98.4%

Scope of aggregation (non-consolidated): Mitsubishi Shoji Building, Marunouchi Park Building, and certain other offices in Tokyo * Waste volume figures exclude waste resulting from internal construction service tasks.

Non-Consolidated Waste Volume (Domestic Branches, Branch Offices and Other Offices, Non-Consolidated Business Emissions)

	2016.3	2017.3	2018.3
Waste	2,245,240	1,342,840	1,139,287

* Figures include construction waste from construction projects where MC is the original contractor and emissions from welfare facilities.

* Figures exclude specially controlled industrial waste (infectious waste, PCB waste).

* There is no record of nitrous oxide (NOx), sulfur oxide (SOx), or volatile organic compound emissions.

Reference: Toxic Waste Emissions (P.56)

Recycling volume

	2016.3	2017.3	2018.3
Recycling volume	597,000	596,900	554,300

* 100% recycling rate for the Mitsubishi Shoji Building (owned by MC).

Non-Consolidated Recycling Volume (Food Waste)

Non-Consolidated Recycling Volume (Food Waste)			(Units: kg)
	2016.3	2017.3	2018.3
Food waste recycling volume	711,900	517,400	239,100

MC periodically reports on its food waste on a non-consolidated basis including amounts generated and recycled in accordance with Japan's Food Recycling Law, and works to recycle in line with targets the law stipulates that companies must strive to achieve.

Non-Consolidated Recycling Volume (Container and Packaging Waste)			(Units: kg))
	2016.3	2017.3	2018.3
Mandatory container and packaging recycling volume	20,031	25,817	28,096

* Regarding container and packaging waste discarded by consumers, the mandatory container and packaging recycling volume as an importer. Waste produced by MC on a non-consolidated basis is not included.

MC fulfills its recycling obligations pertaining to container and packaging waste on a non-consolidated basis as an importer in accordance with Japan's Containers and Packaging Recycling Law.

Independent Practitioner's Assurance

To enhance the reliability of its data, MC has obtained the assurance of Deloitte Tohmatsu Sustainability Co., Ltd., an independent practitioner, for its environmental performance data*.

* In order to enhance data reliability, ESG Data marked with a star (*) for the year ended March 2018 has received independent practitioner's assurance from Deloitte Tohmatsu Sustainability Co., Ltd.

Reference: Independent Practitioner's Assurance Report (P161)



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Human Rights

Policy

Basic Approach on Human Rights (Including Response to International Norms)

MC believes that respect for human rights is fundamental to doing business globally. The Universal Declaration of Human Rights is proclaimed as "a common standard of achievement for all peoples and all nations" to respect and ensure human rights and liberty. It was adopted at the third United Nations (UN) General Assembly on Dec. 10, 1948. MC supports this declaration and stipulates its respect for human rights in its Corporate Standards of Conduct and Social Charter. Furthermore, MC's Code of Conduct for executives and employees states that the company will "respect human rights; will not engage in discrimination on the basis of race, ethnicity, creed, religion, or any other grounds; will not tolerate harassment; will foster a proper understanding and awareness of the issue of human rights; will respect the cultures, customs, and language of other countries and regions." MC also supports international norms such as the UN Guiding Principles on Business and Human Rights, the core labor standards of the International Labour Organization

Policy on Children's Rights

MC understands that children are especially vulnerable to human rights abuses and that special consideration of their rights is necessary. MC also believes that respecting the rights of children allows them to better understand their own rights, which in turn contributes to their ability to become active members of society and leaders of future generations.

With this understanding, MC supports the United Nations and ILO treaties* regarding children's rights and will strive to ensure that these rights are respected throughout our business. In

Policy on Indigenous Peoples' Rights

In the context of its overall commitment to respecting human rights, MC pays special attention to upholding the rights of indigenous peoples, acknowledging their unique social and legal status under national and international laws, as well as their unique histories and cultural contributions throughout the world. When examining new business investment proposals, MC takes into consideration (ILO), and the Voluntary Principles on Security and Human Rights. In the UK, the government established the UK Modern Slavery Act (MSA) which requires certain companies to disclose actions taken to mitigate modern slavery in their supply chains. In response to this legislation MC publishes a statement annually. Furthermore, the Mitsubishi Corporation Policy for Sustainable Supply Chain Management includes clauses covering the prohibition of forced labor and child labor. MC expects its suppliers to understand, embrace and abide by this policy.

Reference: The Corporate Standards of Conduct, Code of Conduct, and Mitsubishi Corporation Social Charter (P.01–02)

> FY2017 Slavery and Human Trafficking Statement http://www.mitsubishicorp.com/jp/en/csr/management/ pdf/slavery_and_human_tracking_statement_en.pdf

particular, MC supports the Convention on the Rights of the Child, including children's survival and development rights, protection rights, and participation rights. MC also supports the Children's Rights and Business Principles, strives to prevent abuses of children's rights in our business, and invests in social contributions through philanthropic efforts focused on children's rights.

how the business operations may impact the rights of indigenous peoples and will consult with the affected communities to ensure that such investment is made having regard to relevant international standards. In addition, MC supports the United Nations Declaration on the Rights of Indigenous Peoples.

^{*} The UN Global Compact, the Convention on the Rights of the Child, the Children's Rights and Business Principles, the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (ILO Convention No. 182), etc.

Human Rights

Policy on Human Rights Consideration when Retaining Armed Security Services

Mitsubishi Corporation (MC) understands the importance of protecting its employees from dangers such as violence and preventing theft of assets throughout its business operations, and retains armed security services when deemed necessary.

MC believes that the abuse of weapons by security forces involves a potential risk of human rights abuse. With regard to retaining armed security services, in addition to complying with the laws of the countries and regions in which it operates and adhering to international standards, MC also supports relevant international agreements*.

* The UN Global Compact, the Voluntary Principles on Security and Human Rights, the UN Code of Conduct for Law Enforcement Officials, the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, etc.

Structure

Officers in Charge	Iwao Toide (Member of the Board, Executive Vice President, Corporate Functional Officer, Business Investment Management, Corporate Sustainability, Al/IoT) Akira Murakoshi (Member of the Board, Executive Vice President, Corporate Functional Officer, Public Relations, Human Resources)
Deliberative Body (A subcommittee under the Executive Committee, a management decision- making body)	Sustainability & CSR Committee, Human Resources Development (HRD) Committee Important matters related to human rights deliberated by the committees are formally approved by the Executive Committee and put forward or reported to the Board of Directors based on prescribed standards.
Departments in Charge	Corporate Sustainability Dept., Global Human Resources Dept.

Reference: Diagram of the Sustainability Promotion Framework (P.07)

Risk Management

When reviewing investment and loan proposals MC conducts a comprehensive screening process which considers not only economic factors, but ESG impacts as well. From the viewpoint of human rights, MC's assessments and considerations are informed by the following areas: (1) the rights of indigenous peoples, (2) existence of infringements to children's rights, and (3) human rights-related due diligence at investee companies and in the

Grievance Systems

MC has established an internal human rights consultation desk so that any human rights concerns can be raised. The system ensures that grievances can be raised any time by mail, telephone or in person. This consultation desk can be used anonymously and in confidence, and matters are handled impartially. Solutions are offered with the utmost consideration of the person's views and wishes. Employees are informed about the grievance system supply chain. MC's risk management approach is informed by the UN Guiding Principles on Business and Human Rights, the IFC guidelines and the Japan Bank for International Cooperation (JBIC) Guidelines for Confirmation of Environmental and Social Considerations. Besides screening new investment and exit proposals, MC also strives to make improvements to existing business investments by monitoring their management practices.

during human rights awareness training at the time of employment, and information is posted at all times on internal bulletin boards. MC also covers human rights issues via a compliance e-learning program to which all executives and employees are subject. In addition, on a consolidated basis, MC provides human rights training to employees who are temporarily transferred to affiliated companies.

Human Rights

Sustainability Advisory Committee

MC has established the Sustainability Advisory Committee which consists of 8 external experts. MC regularly seeks the diverse perspectives of this committee about the Company's human rights efforts and other sustainability matters. In addition to regular committee meetings, committee members also visit business sites on an annual basis in order to deepen their understanding of the Company's sustainability efforts.

Reference: Sustainability Advisory Committee (P.08)

Initiatives

Support for Vulnerable Children and At-Risk Youth

Through SOS Children's Villages Morocco, MC is supporting education programs for orphans and other children considered vulnerable or at-risk in Morocco.

With the aim of establishing a stable daily life and safe homes

Friendship Camp for Mothers and Children

MC has been holding the Friendship Camp for Mothers and Children since 1974 with the aim of providing a place where children can play, rest, meet people and enjoy their rights as children. The Camp is catered to single mothers and their children, and gives them a chance to interact with nature. It is currently held in Yoshizato, Minamiuonuma-city, Niigata Prefecture. Employee volunteers train and hold meetings for about three months before the for children, this initiative provides a variety of educational support to promote independence in adulthood, helps with skills development and also connects them with employment support.

Camp so that the children can maximize their time being at one with nature. To date, approximately 17,000 mothers and children and approximately 1,000 employee volunteers have participated. The Camp is one of MC's flagship philanthropic activities and aligns with the Company's focus on long-running initiatives and employee participation.

Examples of External Collaboration

MC regularly participates in the United Nations Forum on Business and Human Rights and strives to grasp the latest trends in the business and human rights field. In addition, MC participates in the World Business Council for Sustainable Development (WBCSD)'s People Program in order to exchange information with other companies and learn best practice. MC actively participates in other initiatives and events related to human rights such as seminars held by Shift, an organization which specializes in research with respect to the UN Guiding Principles on Business and Human Rights.

Reference: WBCSD (P.09)

Labor Practices

Labor Practices

1. Labor Standards, Labor Environment and Related Matters

Policy

Basic Approach to Human Resources

Human resources are MC's greatest asset. The MC Group has a workforce of approximately 77,000 employees worldwide. In response to the further diversification and globalization of its businesses, the MC Group is working to develop human resources and support their success on a Group-wide and global basis. This is to create fulfilling and lively workplaces where MC's diverse group of employees, regardless of gender, nationality and other attributes, are able to demonstrate their unique abilities to the fullest extent possible.

Policy on Labor Practices

(1) MC's Policy on Labor Practices

MC believes that consideration for human rights is essential in the course of undertaking various businesses worldwide. Based on this belief, MC's Code of Conduct stipulates that MC will respect human rights and will not engage in any form of discrimination or harassment. With regard to labor practices, MC stipulates the International Labour Standards* of the International Labour Organization (ILO) as the relevant regulations underpinning the compliance requirements detailed in the Code of Conduct.

Reference: Basic Approach on Human Rights (P.64)

* ILO International Labour Standards

The International Labour Organization (ILO) was founded in 1919 on the basic principle that universal and lasting peace can be established only if it is based on social justice. Since its establishment, one of the most important functions of the ILO has been the formulation of international labor standards through Conventions and Recommendations. The ILO has a tripartite structure with workers and employers participating as equal particular based or the ILO and ratifying States commit to observing them. The ratifying States also use Recommendations to guide their national policies, lawmaking and actions. Since its founding, the ILO has adopted Conventions and Recommendations that cover nearly every issue affecting the working world. The ILO has established four fields and eight conventions as fundamental labor standards (see table below). MC endorses all of these fields and conventions, and makes specific reference to compliance with the min the Mitsubishi Corporation Code of Conduct.

(2) Participation in the UN Global Compact

MC joined the UN Global Compact in 2010, declaring our commitment to the ten universal principles in four fields: human rights, labor, environment and anti-corruption. Guided also by the spirit of the Three Corporate Principles, we are promoting initiatives in each of these four areas.

Reference: Support for the UN Global Compact (P.06)

The Four Fields and Eight Conventions Constituting Fundamental Labor Standards

Freedom of association and the effective recognition of the right to collective bargaining	Convention concerning Freedom of Association and Protection of the Right to Organise (No. 87) Convention concerning the Application of the Principles of the Right to Organise and to Bargain Collectively (No. 98)
Elimination of all forms of forced or compulsory labor	Convention concerning Forced or Compulsory Labour (No. 29) Convention concerning the Abolition of Forced Labour (No. 105)
Effective abolition of child labor	Convention concerning Minimum Age for Admission to Employment (No. 138) Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (No. 182)
Elimination of discrimination	Convention concerning Equal Remuneration for Men and Women Workers for Work of Equal Value (No. 100) Convention concerning Discrimination in Respect of Employment and Occupation (No. 111)

Structure

Officer in Charge	Akira Murakoshi (Member of the Board, Executive Vice President, Corporate Functional Officer, Corporate Communications, Human Resources)
Deliberative Body (A subcommittee under the Executive Committee, a management decision- making body)	Human Resources Development (HRD) Committee Important matters related to labor practices deliberated by the committees are formally approved by the Executive Committee and put forward or reported to the Board of Directors based on prescribed standards.
Department in Charge	Global Human Resources Dept.

Risk Management

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, including labor relations and labor management. Besides screening new investment and exit proposals, MC also strives to make improvements to existing business investments by monitoring their management practices.

Initiatives

(1) Providing Young People with Employment Opportunities

- MC conducts recruitment activities targeting new graduates of universities and graduate schools every year.
- MC conducts work experience-oriented workshops with the goal of providing university and graduate students with career education.

(2) New Work Styles Befitting MC

We are making determined attempts to pursue "new work styles befitting MC," which allow us to enhance work productivity and efficiency while delivering high results and performance. The initiative aims to ensure each organization and individual autonomously practices work styles that best suit respective needs.

While taking into consideration the uniqueness of each organizational and individual initiative due to diversified business environments, industries and other factors they face, we aim to achieve an average annual paid leave utilization rate of 70% or more by systematically encouraging personnel throughout the Company to take their annual paid leave. In addition, we formulate and implement individual improvement measures that require overtimeheavy organizations to develop more efficient labor-saving practices. As a result, in the fiscal year ended March 2018, MC came very close to achieving those objectives, with employees on average taking 69% of their paid leave and working 24.7 hours of overtime per month on a non-consolidated basis.

Our efforts extend to a work environment that enables diverse employees to thrive professionally while fostering an organizational culture in which performance is evaluated fairly on the basis of results.

(3) Respect for Human Rights

MC's Corporate Standards of Conduct emphasize respect for human rights, while the Code of Conduct and Social Charter stipulate that the Company will respect human rights, not engage in any form of discrimination or harassment, not engage in discrimination on the basis of race, ethnicity, creed, religion, gender, nationality, age, origin, physical or mental disability, illness or any other grounds, and respect the cultures, customs, and languages of other countries and regions.

In addition to conducting human rights training for new employees, MC also has a Basic Policy on Preventing Harassment which is disseminated widely throughout the Company. 'Harassment' is defined in the Basic Policy as encompassing sexual harassment and "power harassment," as well as maternity harassment (disadvantageous treatment related to pregnancy, childbirth, childcare leave, family care leave and so on). It also states that harassment encompasses verbal or physical conduct of a sexual nature, regardless of sexual orientation or gender identity such as LGBT. Moreover, MC has established human rights help desks internally and outside the Company. The help desks operate around the clock, providing consultations via e-mail, telephone, in person or by other means.

MC takes additional steps to ensure that its consolidated operations are also aware of its human rights standards. For example, employees who are dispatched to MC affiliate companies also receive human rights training (including topics such as prevention of forced labor and child labor, etc.).

Relevant Data

	2018.3
Annual average actual working hours*1	1933.9 hours
Monthly average overtime hours*2	24.7 hours
Percentage of annual paid leave taken*3	69%
Number of violations of the Labor Standards Act*4	0
Voluntary turnover rate (Compared to the number of employees as of March 31, 2018)	1.2%
Ratio of non-regular employees*5	Approx. 8%

*1 Employees at the Head Office and Japanese branches (excluding corporate advisers and contract employees).

- *2 Employees at the Head Office and Japanese branches (excluding managers, corporate advisers and contract employees).
 - The above represents the monthly average for work in excess of scheduled working hours. The monthly average for work in excess of statutory working hours was 11.7 hours.

*3 Employees at the Head Office and Japanese branches (excluding secondees from other companies).

The annual paid leave utilization rate excluding managers was 75%.

*4 Employees at the Head Office and Japanese branches.

*5 The average number of temporary employees in the year ended March 2018 was 550.

Reference: For other types of personnel data, please visit MC's website by following the link below. https://www.mitsubishicorp.com/jp/en/about/resource/ data.html

Labor Practices

2. Diversity Management

Policy

A Flexible and Powerful Organization Capable of Adapting to Changing Business Environments

The MC Group's global workforce is made up of a diverse group of employees in terms of lifestyles and values. As the MC Group's businesses rapidly become more global and diverse, MC recognizes that it will be essential to drive growth while encouraging a diverse range of employees to share common values and engage in healthy competition with one another. Doing so will be vital for achieving sustainable corporate growth. We believe that the significance of diversity management at the MC Group lies in building a strong organization with the flexibility to adapt to changing business environments. In sharing the spirit of its guiding philosophy, the Three Corporate Principles, the MC Group aims to:

- Recruit and apply its broad professional expertise without discrimination.
- Reap the benefits of workforce diversity by embracing and applying different perspectives and ideas to its management practices, business creations and regional developments.
- Improve organizational performance by ensuring an inclusive professional work environment that maximizes the abilities of a diverse workforce.

[Specific Initiatives]

- · Reviewing work styles with an emphasis on work-life balance
- Building a corporate culture that embraces diverse values
- Supporting employees with childcare, family care and other family responsibilities
- Supporting women's careers
- Engaging expertise of senior employees
- Engaging expertise of employees with impairments
- Engaging expertise of employees regardless of nationality
- Promoting understanding of LGBT issues

Structure

Officer in Charge	Akira Murakoshi (Member of the Board, Executive Vice President, Corporate Functional Officer, Corporate Communications, Human Resources)
Deliberative Body (A subcommittee under the Executive Committee, a management decision- making body)	Human Resources Development (HRD) Committee Important matters related to labor practices deliberated by the committees are formally approved by the Executive Committee and put forward or reported to the Board of Directors based on prescribed standards.
Department in Charge	Global Human Resources Dept.

Reference: Diagram of the Sustainability Promotion Framework (P.07)

In 2007, MC established its first organization specifically dedicated to diversity management in the Global Human Resources Department (originally named the Work Environment Support Office, it was renamed as the Diversity Management Promotion Office the following year). Thereafter, following reorganization, MC established the Diversity Office in October 2014.

The Diversity Office strives to enhance and expand support measures for employees balancing work with childcare or family

care responsibilities. It also considers measures such as initiatives to support the careers of non-Japanese employees working in locations overseas.

MC will continue to undertake initiatives to further improve its work environments in order to ensure that each employee in its diverse workforce is able to keep motivated and achieve his or her own full potential.
Initiatives

(1) Supporting Employees with Family Responsibilities

MC has been improving its internal systems to enable employees to better balance matters such as childcare and family care with their careers. MC will continue to focus on building a corporate culture that embraces diverse work styles in order to create a comfortable and supportive atmosphere that understands and encourages the active utilization of these systems.

Initiatives to Date (Years ended March 2005 to 2016)

Guided by its action plan to support a diverse workforce, MC has developed, upgraded and expanded systems that can be utilized by both men and women. In Phase 1, MC focused primarily on enhancing and expanding systems as part of efforts to develop an environment where employees with childcare or family care responsibilities could continue working. In Phase 2, in addition to continuously upgrading and expanding systems, MC concentrated on encouraging all employees to improve their work styles. In Phase 3, MC devoted efforts to upgrading and expanding systems further and promoting understanding of existing systems.

Details of Activities in Phases 1-3

Phase 1 (April 1, 2005 to March 31, 2008)

In Phase 1, MC focused primarily on enhancing and expanding systems as part of efforts to develop an environment where employees with childcare or family care responsibilities could continue working.

.....

- Established a childcare leave period in excess of statutory requirements
- Introduced new systems such as paid childcare leave and a family care leave system
- · Expanded shortened work hours during pregnancy
- Expanded paid pregnancy leave
- · Implemented internal awareness-raising activities to promote understanding of the above systems
- Opened an internal counseling desk, among other initiatives

Phase 2 (April 1, 2008 to March 31, 2013)

In Phase 2, MC concentrated on encouraging all employees to improve their work styles, in addition to continuously upgrading and expanding systems. To this end, MC implemented the following initiatives:

•••••

- Implemented measures to reduce work hours and encourage employees to take paid leave
- Created workplaces where employees are able to engage in diverse working styles
- · Encouraged male employees' participation in childcare (Abolished spouse requirements and established paternity leave after childbirth)
- Enhanced and expanded childcare-related subsidy systems (babysitting subsidy)
- · Secured daycare centers, among other initiatives

Phase 3

(April 1, 2013 to March 31, 2016)

In Phase 3, MC devoted efforts to promoting understanding of existing systems and enhancing their user-friendliness, along with upgrading and expanding systems further, through the initiatives described below.

.....



Target 1 Promote understanding of existing systems (during planned period)

- Explained systems, laws and regulations pertaining to support for employees with work and family responsibilities in training sessions for managers (fiscal year ended March 2015)
- For reference purposes, introduced examples of employees balancing work and family responsibilities using childcare-related systems, among other initiatives (fiscal year ended March 2014 through the end of the planned period)

Target 2 Enhanced the user-friendliness of existing systems (during the planned period)

- Shifted certain childcare leave systems to paid leave systems (fiscal year ended March 2014)
- Enhanced and expanded options for flexible work hours (extended eligible hours for the flex-time system, etc.) (fiscal year ended March 2014 through the end of the planned period)

Childcare Support

MC seeks to put the support of the entire Company behind employees who are balancing their work with maternity and paternity roles and childcare responsibilities. For this, MC is working to upgrade and expand various systems available for use by both men and women.

Maternity/Paternity and Childcare Systems

						Anter Neturn to WORK	7	
	Life Stage	During Pregnancy		uring Maternity / aternity Leave	Nursery School	Elementary School Years 1–3	Elementary School Years 4-6	
					 	1		
Maternity/Paternity Leave & Types of Paid Leave				 	1	1		
Paid Pregnancy Leave			Up to 20 days	1	1 1 1	I I		
Paid Special Medical Leave (for pregnancy)					1		1	
Paid Special Medical Leave (for childcare)							Until year 3 of elementary so	chool
Paid Prenatal Leave			6 weeks prior to and inc	uding expected delivery	date	1		
Paid Spousal Childbirth Leave		_	Up to 5 days (may	e taken anytime from th	e day the spouse enters h	ospital until 3 months aft	er birth of child)	
Paid Postnatal Leave				8 weeks from day after	birth of child	 	1	
Maternity/Paternity Leave			 		Until end of month of c	hild's 2nd birthday		
Paid Childcare Leave				 			Up to 10 days per fiscal year	r
Paid School Events Leave				1			Up to 3 days per fisc	cal year
				1 1 1	1	1		
				 		1		
Work Style Options			 	 	 	 	1	
Shortened work hours during pregnancy			Up to 120 minutes per o	ay	1	 		
Staggered work hours during pregnancy			Up to 45 minutes in the	morning	1		1	
Lighter workloads				From start of pregnanc	y until 6 months after birt	h of child		
Exemptions from or restrictions on overtime hours			During pregnancy	 	 	Until child enters eleme	ntary school	
Shortened work hours for childcare			 	 		 	Up to 120 minutes per day	
Staggered work hours/flex-time				1	1	 	Until year 6 of elementary	school
Telecommuting (working from home)				1		1	Until year 6 of elementary	schoo
Half-day paid leave				1 		1	Until year 3 of elementary	schoo
				 	1	1	1	
Company Support				1	1 	 		
MC Childcare Concierge				 	1			
Information-sharing network				 	 	I I		
Use of nearby nursery school			1	1	From 5	I I Ith day after child's hirth	until child enters elementary	school
Discounted use of temporary daycare services at a nearby facili	tv			1			reaches year 6 of elementary	
Babysitting subsidy	·)			1			Until year 3 of elementary	
Use of sick-child daycare facility				1		1		
MC Gakudo				1	1	1	Until year 6 of elementary	
inc Gulduo				1	1	1	Elementary school yea	ais 1-0

MITSUBISHI CORPORATION ESG DATA BOOK

Establishment of MC's Childcare Concierge within the Global Human Resources Department

To help employees smoothly return to work from maternity and paternity leave, MC has set up the Childcare Concierge within its Global Human Resources Department. This service provides employees with information on daycare facilities, babysitters, services for children to continue their studies after regular school hours, etc. It also provides consultations about pediatric health and other concerns that employees may have about raising children.

Children's Daycare Facilities & Services

MC has secured the services of a nearby daycare facility so that employees can smoothly return to work when they wish. In addition, MC has also secured the services of sick-child daycare facilities so that employees always have access to a daycare facility and babysitters who they can rely on confidently when their children are ill. In addition, MC has been providing the MC Gakudo service for employees with children in elementary school. This service provides day camps for children during long vacation periods from school.

Paid School Events Leave, Staggered Work Hours, Flex-Time Work and Telecommuting (working from home)

MC has established a system for paid school events leave, which allows employees to take time off to attend official school and daycare events, such as entrance and graduation ceremonies. Employees with children up to year 6 of Japanese elementary school can also utilize the staggered work hours and flex-time systems. Furthermore, since July 2018, MC has been supporting employees balancing work and childcare by establishing a new system for telecommuting (working from home).

Encouraging Work Style Diversity and Work-Life Balance

MC has distributed its Childcare Support Handbook to all MC employees, as part of its efforts to promote understanding and foster a supportive culture internally. The handbook includes not only explanations on all of MC's childcare systems and policies, but also provides specific advice for mothers, fathers, bosses and colleagues on how to improve office communication. MC also provides regular guidance to staff in management-level positions.

Family Care Support

MC has established systems to support the various needs of employees who have family members requiring care. These include systems that allow employees to take a period of leave from work to focus on family care, as well as systems that allow employees to care for family members while continuing to work. Employees can utilize the staggered work hours and flex-time systems as long as the care is necessary. A separate family care counseling service has been established to allow employees and their family members to quickly receive advice on a wide range of care-related issues.

Family Care Support Systems

, , , , , , , , , , , , , , , , , , , ,	· ·) · · · ·	
Family members requiring nursing care	Spouses, children, parents, parents of spouses, grandparents, grandchildren, brothers and sisters	
Paid Family Care Leave	10 days per fiscal year, paid (can be taken in half-day segments and cannot be carried over)	
Work Styles	 Exemptions from and restrictions on late-night, overtime and weekend work Staggered work hours/flex-time Special medical leave (for family care reasons) Abolish restrictions on acquiring paid leave in half-day segments (for family care reasons) Consultations on family care with external experts 	
Family Care Leave	1 year on a cumulative basis for each family member requiring family care (365 days including non-business days) * Can be obtained in separate segments for each family member requiring ongoing, constant nursing care	
Employee benefits	• Use of WELBOX nursing care services (24-hour consultation desk)	

Encouraging Work Style Diversity and Work-Life Balance

MC has distributed a Family Care Support Handbook to all employees as part of its efforts to promote understanding and foster a supportive culture internally. The handbook includes not only explanations of all of MC's family care systems and policies, but also provides specific advice for employees providing family care, as well as for bosses and colleagues on how to improve office communication. MC also provides guidance to those in management-level positions and family care seminars for all employees on a regular basis.

Re-Employment System for Employees Accompanying Spouses on Domestic or International Job Transfers

Providing that certain conditions are met, MC will re-employ those who previously left the company due to their spouses' domestic or international job transfers. This system was introduced to enable these personnel to resume their careers at MC by making the most of their prior experience and skills.

(2) Supporting Women's Careers at MC

MC has established the following action plan to create an environment that offers even stronger support for women's careers.

In addition to this action plan, MC will support women's careers throughout the MC Group.

OAction Plan Period: April 1, 2016 to March 31, 2021

○ Targets and Description/Implementation Period of Initiatives

Target 1: Aim to recruit more women as professional staff <Description of initiatives>

- Conduct briefings and strengthen online publicity and outreach activities for female students
- Aim to enhance the ratio of female applicants by fostering an understanding of the careers and work styles of female employees (year ended March 2017 through the end of the planned period)

Target 2: Offer further career support for women

Target 3: Increase the percentage of women in management-level positions to 10% or more by the year ending March 2021

<Description of initiatives>

- Appoint a Women's Career Manager in each department to analyze issues related to and consider initiatives supporting women's careers. They will also consult with female employees (year ended March 2017 through the end of the planned period)
- Host internal lecture seminars led by external instructors to change the mindset of all MC employees (work styles, division of duties between men and women, and related issues) (year ended March 2017 through the end of the planned period)

 Consider holding events, such as seminars for employees following their return to work as well as follow-up seminars to foster awareness among female employees raising children (year ending March 2018 through the end of the planned period)

Target 4: Aim to achieve 100% utilization of paid paternity leave or other similar childcare systems by men

<Description of initiatives>

- Strengthen notification to all departments that all male employees with expectant spouses should take paid paternity leave (year ended March 2017 through the end of the planned period)
- Inform departments that male employees with children are encouraged to take paternity leave, paid school event leave, and paid childcare leave (year ended March 2017 through the end of the planned period)

Target 5: Organize training programs and seminars on supporting women's careers, new work styles* and work-life balance support systems Improve the content of management training programs to increase awareness

* MC is taking steps to pursue "new work styles befitting MC" (reducing excessive overtime and encouraging employees to take paid leave), which allows for enhanced work productivity and efficiency while delivering strong results and performance. These initiatives are designed to ensure that each organization and individual can work autonomously in a manner best suited to their needs.

<Description of initiatives>

- Explain new work styles and management as well as diversity (including supporting women's careers) in the Leader Development Program, General Manager Seminar, and other training events (year ended March 2017 through the end of the planned period)
- Consider improving the content of management training programs (year ended March 2017 through the end of the planned period)
- Conduct briefings on work-life balance support systems and related internal communications (year ended March 2017 through the end of the planned period)

Career support based on major life events during childbirth and childcare periods

Taking into account the major life events of individual employees, MC is focused on systematically providing career development opportunities to the greatest extent possible, including overseas assignments. For female employees planning to take maternity leave or those currently on maternity leave, MC explains the relevant systems and policies, along with providing opportunities for them to listen to the experiences of their senior colleagues regarding work styles after returning to work from maternity leave.

Support for employees on overseas assignments accompanied only by children

In some cases, employees may be assigned overseas and accompanied only by their children of junior high school age or younger, without their spouses. In these cases, MC provides support to ensure a smooth assignment and the necessary arrangements for daily life during the assignment. This includes sending the employee on business trips to the location prior to the assignment, arranging housing in advance, concurrently allowing family members to join the employee, and providing a special subsidy for accompanying family members.

(3) Engaging the Senior Workforce

The awareness and attitudes to wards working beyond the age of 60 differs widely from one person to the next, and opinions on the subject are likely to vary even more in the coming years. In 2006, besides introducing its Re-Employment Course System for extending the careers of employees aged 60 and over, MC also enhanced the functions of its Career Design Office, which provides comprehensive support for senior employees.

The Career Design Office establishes and manages a human resources (HR) system exclusively for senior employees. Individualized arrangements are made with each employee who wishes to continue working beyond the age of 60 or who would like to consider their future life/career. Comprehensive support is available through the provision of various information and training programs, collection of recruitment information, job matching services, and other means.

Functions of the Career Design Office



(4) Engaging the Expertise of Persons with Impairments

As part of its CSR and diversity initiatives, MC has a long and proud history of employing persons with impairments. Together with its special-purpose subsidiary, Mitsubishi Shoji & Sun Co., Ltd., MC will continue its efforts in expanding career opportunities for persons with various impairments, while maintaining the statutory employment rate for these workers.

Helping to Increase Employment Opportunities for Persons with Impairments —Mitsubishi Shoji & Sun Co., Ltd.

Mitsubishi Shoji & Sun Co., Ltd. was established in 1983 as an IT company following a joint investment by MC and Social Welfare Organization Japan Sun Industries. It is headquartered in Beppu City, Oita Prefecture, and has offices in Tokyo (Marunouchi) and Hokkaido (Iwamizawa). Operating under its corporate philosophies of coexistence between persons with and without impairments, corporate self-reliance, and new corporate value, Mitsubishi Shoji & Sun Co., Ltd. works to increase employment opportunities for various persons with impairments while providing IT services such as system development, data entry, DTP and server operation to numerous business partners including MC and other MC Group companies.

Reference: Mitsubishi Shoji & Sun Co., Ltd. website (Japanese only) http://www.mctaiyo.co.jp/

(5) Engaging a Global Workforce

Support for Non-Japanese Employees

MC provides support to non-Japanese employees working in Japan by providing information on matters such as application procedures for period of stay extensions, rental housing, pensions and medical information. MC also provides a consultation desk to field any concerns or questions that non-Japanese employees may have about living and working in Japan.

Reference: For details on value sharing and international transfers of employees at overseas offices, please see Human Resource Development on pages 97 to 98.

Relevant Data

Data on Employees Using MC's Various Systems (As of March 31 Each Year)

	2014.3	2015.3	2016.3	2017.3	2018.3
Number of employees who took Paid Spousal Childbirth Leave	67	67	88	100	83
Number of employees who took Maternity/Paternity Leave*1	25	44	28	35	66
Male	0	2	2	3	14
Female	25	42	26	32	52
Number of employees who took Paid Childcare Leave	153	165	215	211	224
Male	40	52	79	87	94
Female	113	113	136	124	130
Number of employees who took Paid School Events Leave*2	-	-	232	252	265
Male	-	_	97	121	123
Female	-	_	135	131	142
Number of employees who shortened work hours for childcare	65	59	71	72	73
Male	2	1	2	1	0
Female	63	58	69	71	73
Number of employees who obtained staggered work hours or flex-time for childcare reasons	18	25	47	37	41
Male	1	2	9	6	5
	17	23	38	31	36
Number of MC Childcare Concierge consultations*2	-	_	140	115	141
Male	-	_	46	43	42
Female	-	_	94	72	99
Number of participants in MC Gakudo (total)*2	-	_	118	115	131
Number of participants in training seminars for employees on childcare leave*2	-	_	39	20	28
Number of employees who took Family Care Leave*1	2	3	1	4	1
Male	0	1	0	1	0
Female	2	2	1	3	1
Number of employees who took Paid Family Care Leave	154	165	169	196	225
Male	42	44	44	59	71
Female	112	121	125	137	154
Number of employees who obtained staggered work hours or flex-time for family care reasons	2	2	3	5	7
Male	0	0	0	0	1
	2	2	3	5	6
Number of consultations by the family care consultation desk	82	82	79	61	45
Number of employees who applied for the re-employment system for employees who left to accompany spouses on domestic or international transfers* ³	11	8	12	10	10

*1 Number of employees who began taking this type of leave during each fiscal year ended March 31.

*2 Newly established in the year ended March 2016.

*3 Re-employment system for employees accompanying spouses on domestic or international transfers refers to a system in which re-employment is offered, under certain conditions, to employees who resign from their positions in order to accompany their spouse to the location of a domestic or international transfer.

Social

Labor Practices

Percentage of Women in Management-Level Positions and Gender Composition of Board Members

$\begin{array}{c} (\%) \\ 12 \\ 10 \\ 8 \\ 6 \\ 4 \\ 3.1\% \\ \end{array} \begin{array}{c} 10.4\% \star \\ 9.4\% \\ 6 \\ 4.7\% \\ 5.4\% \\ 4 \end{array}$

Percentage of Women in Management-Level Positions



Gender Composition of Board Members			
(as of June 30, 2018)	(Unit: person)		
	Male	Female	
Members of the Board	12	1	
External Directors	4	1	
Audit & Supervisory Board Members	4	1	
External Audit & Supervisory Board Members	2	1	
Executive Officers	49	0	

MC Women Overseas (as of April 2018)





Employment Rate of Persons with Impairments

Independent Practitioner's Assurance

To enhance the reliability of its data, MC has obtained the assurance of Deloitte Tohmatsu Sustainability Co., Ltd., an independent practitioner, for its non-consolidated personnel data*.

* In order to enhance data reliability, ESG Data marked with a star (★) for the year ended March 2018 and March 2019 has received independent practitioner's assurance from Deloitte Tohmatsu Sustainability Co., Ltd.

Reference: Independent Practitioner's Assurance Report (P161)

Social

Labor Practices

Evaluation by Society

Key Certifications



In January 2017, MC received the Platinum Kurumin Certification from the Ministry of Health, Labour and Welfare. The Platinum Kurumin Certification is awarded to Kurumin-certified companies that have implemented measures to support employees' childcare needs at a higher standard. At MC, childcare benefits include both maternal welfare and childcare support. The Company has been working to create processes as well as an environment that supports employees with children. Specifically, MC has ensured that its Maternity/Paternity Leave exceeds Japan's minimum legal requirements, and has introduced other measures to help employees returning from Maternity/Paternity Leave to comfortably balance their parenting and work responsibilities. These include a flex-time system as well as shortened or staggered work hours. MC has also made it easier for male employees to take advantage of these benefits, such as by lifting the restriction that previously did not allow employees' spouses access to full-time childcare, and also by introducing MC's Paid Spousal Childbirth Leave. As a result of these and other measures to support work-life balance, MC has received Kurumin certification from the Ministry of Health, Labour and Welfare continuously since 2008, in recognition of the action plan it has formulated and implemented to support employees' childcare needs.

* About the Kurumin certification and Platinum Kurumin certification (Excerpt from the Ministry of Health, Labour and Welfare's website) Enterprises that have formulated general business operator action plans in accordance with the Act on Advancement of Measures to Support Raising Next-Generation Children and satisfy certain standards may apply to receive certification by the Minister of Health, Labour and Welfare (Kurumin certification) as a company that supports the childcare needs of employees. Moreover, the new Platinum Kurumin certification was instituted on April 1, 2015 to recognize Kurumin-certified enterprises that have made considerable progress in terms of the introduction and use of work-life balance support systems and

which have executed measures to a high standard, along with encouraging these enter-

Reference: Reference: Work-Life Balance Plaza (Japanese only)

prises to continuously undertake such measures.



In January 2017, MC received L-boshi (second level) certification from the Ministry of Health, Labour and Welfare as an outstanding enterprise in promoting women's participation and career advancement.

* About the L-boshi certification (Excerpt from the Ministry of Health, Labour and Welfare's website)

The Act on Promotion of Women's Participation and Advancement in the Workplace entered into force on April 1, 2016. Under this act, enterprises that have formulated general business operator action plans and have submitted notification to the effect that they have formulated such plans, as well as satisfy certain standards, may obtain certification by the Ministry of Health, Labour and Welfare (L-boshi certification) as an enterprise offering excellent conditions with respect to promoting women's participation and career advancement.



On March 3, 2014, MC was jointly recognized by Japan's Ministry of Economy, Trade and Industry (METI) and the Tokyo Stock Exchange (TSE) as a 2014 Nadeshiko Brand, a listed enterprise that is considered "exceptional in encouraging women's success in the workplace."

* About the Nadeshiko Brand (Excerpt from METI's website)

The Nadeshiko Brand initiative has been implemented every year as a joint undertaking by METI and TSE since it was initiated in the year ended March 2013 for the purpose of selecting and publicizing enterprises that encourage the empowerment of women. This initiative seeks to introduce certain listed enterprises that are outstanding in terms of encouraging women's success in the workplace as attractive stocks to investors who put emphasis on improving corporate value in the medium and long term. The aim is to further strengthen the interest of investors in such enterprises and accelerate each enterprise's efforts to encourage women's success in the workplace.

3. Employee Relations

Policy (Freedom of Association and Collective Bargaining)

Basic Approach

MC is engaged in various forms of dialogue with the MC Staff Union at the company-wide level and individual group level. This dialogue is undertaken to reflect in management the opinions and awareness of issues of MC staff who are involved in operations on the ground. Through this process, MC seeks to enhance the

Policy on Freedom of Association and Collective Bargaining

MC has always respected the freedom of association and the right to collective bargaining recognized by the Constitution and various laws and regulations of Japan.

MC has entered into a union shop agreement with the Mitsubishi Corporation Staff Union ("MC Staff Union"), which was formed in 1970. Based on the agreement, all eligible employees are required to join the union, except for those qualified for management-level

Collective Bargaining

MC has established conditions related to collective bargaining between the Company and the MC Staff Union, beginning with labor conditions, as well as related operational procedures. Where necessary, MC has a process in place for both sides to reach agreements by increasing their understanding of the issues through performance of each employee whilst enhancing the business performance of the Company and fulfilling its public mission to create a more positive work environment. The results of this dialogue are taken into consideration by MC in the course of formulating and implementing various policies.

positions and those deemed to be non-union members based on individual agreements, taking into account the characteristics of their duties and other conditions.

Guided by the policy of respecting the freedom of association and right to collective bargaining, MC's operating companies also comply with and respect the laws and regulations and labor practices of their host countries.

discussions undertaken in good faith. In recent years, MC has engaged in collective bargaining between the Company and the MC Staff Union in the process of reviewing compensation and personnel systems and revising annual income.

Structure

Officer in Charge	Akira Murakoshi (Member of the Board, Executive Vice President, Corporate Functional Officer, Corporate Communications, Human Resources)
Deliberative Body (A subcommittee under the Executive Committee, a management decision- making body)	Human Resources Development (HRD) Committee Important matters related to labor practices deliberated by the committees are formally approved by the Executive Committee and put forward or reported to the Board of Directors based on prescribed standards.
Department in Charge	Global Human Resources Dept.

The MC Staff Union had 3,321 members as of March 31, 2018. All eligible employees join the MC Staff Union, except for those considered as non-union members based on agreements between the MC Staff Union and the Company (including those qualified for management-level positions and those deemed to be non-union members in keeping with the characteristics of their duties based on individual agreements). The MC Staff Union is led by an executive chairman elected from among the union members for a term of one year.

The MC Staff Union and the Company share the following basic philosophy: "Recognizing the public mission of companies, both the workforce and management will endeavor in earnest to achieve the sound development of the Company and to improve the economic and cultural standing of union members." Guided by this philosophy, the MC Staff Union carries out a variety of initiatives. Social

Labor Practices

Risk Management

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, including labor relations and labor management. Besides screening new investment and exit proposals, MC also strives to make improvements to existing business investments by monitoring their management practices.

Initiatives

The MC Staff Union and the Company conduct labor management meetings and conferences to raise matters concerning their awareness of issues, report on conditions, and hold discussions, among other activities. These meetings and discussions aid in ensuring proper business management by reflecting the opinions of staff involved in daily duties at the corporate level and the level of each organization.

(1) Labor Management Meetings

The aims of these meetings are to facilitate communication on various matters of mutual interest between the MC Staff Union and the Company through the exchange of views, to reflect the union members' broad range of opinions aimed at stimulating better management policies/business performance, and to create a more positive workplace.

Numerous labor management meetings are held at the levels of each office, business department, division and business group. Not only are the matters discussed in the meetings put to effective use in the management of each organization, they are also placed on the reporting and discussion agenda of Company-wide labor management meetings held once a year, including meetings with the President and CEO, meetings with the Corporate Functional Officer for Human Resources, meetings to discuss yearlong business performance, and meetings to discuss interim business performance.

(2) Conferences

Conferences are held to facilitate communication between the workforce and management on specific matters through the exchange of views and to reflect the union members' broad range of views on energizing the Company through various management policies.

In the year ending March 2019, five conferences will be held on the themes of telecommuting, performance reviews / compensation, secondments, continuous improvement and innovation, and diversity. The MC Staff Union presented reports and proposals to the relevant internal departments based on questionnaires and discussions held within the union, and certain proposals have been implemented by the Company.

Performance

Agreement on Collective Bargaining

Under the Basic Agreement between the Company and the Union entered into by the two parties, collective bargaining covers (1) matters concerning work conditions and (2) other matters for which collective bargaining is deemed necessary by the MC Staff Union and the Company.

Accordingly, the Company and the MC Staff Union have undertaken collective bargaining on the matters described below. In addition, matters deemed to be collective bargaining agreements have been established based on the Basic Agreement between the Company and Union and individual labor management agreements. These collective bargaining agreements cover all employees of the Company.

Year ended March 2015	Revision of annual income (3 collective bargaining sessions) Revision of compensation and personnel systems (4 collective bargaining sessions)
Year ended March 2016	Revision of annual income (3 collective bargaining sessions)
Year ended March 2017	None
Year ended March 2018	Revision of annual income (1 collective bargaining session)
Year ending March 2019 (through the end of September)	None

Occupational Health and Safety

Occupational Health and Safety

Policy

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. Social

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 119–123.

Policy (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 114 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)

MC

- Health check-up rate for overseas assignees: 100%
- Percentage of annual paid leave taken: 70%
- Zero workplace accidents

Reference: For details on performance related to the targets above, please see Performance Data on pages 92-93.

Structure

Officers in Charge	Akira Murakoshi (Member of the Board, Executive Vice President, Corporate Functional Officer, Corporate Communications, Human Resources)	
Deliberative Bodies	Human Resources Development (HRD) Committee, Sustainability & CSR Committee	
(A subcommittee under the Executive Committee, a management decision-making body)	Important matters related to occupational health and safety deliberated by the committees are formally approved by the Executive Committee and put forward or reported to the Board of Directors based on prescribed standards.	
Departments in Charge	Global Human Resources Dept.	

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.07)

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 2018 Health & Productivity Management Outstanding Organizations Recognition Program's WHITE500, a list of 500 companies recognized for excellence in their health and productivity initiatives.



* The Mitsubishi Shoji Building and the Marunouchi Park Building are registered as separate business sites. For each business site, MC has established an occupational health and safety framework as required by labor laws.

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 153.

Initiatives

Initiatives on a Non-Consolidated Basis

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 Appointments

There are approximately 1,200 MC head-office employees on overseas assignments at any given time, and some 1,500 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 Appointments

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 26,000 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 easily attend examinations, medical consultations and receive treatment from specialist physicians.

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 93.

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 78% 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 work-place 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 by MC.

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.

In addition, in Japan, employees are entitled to group influenza vaccinations and are encouraged to observe proper etiquette regarding coughing and hand-washing in order to help prevent the spread of diseases in the workplace.

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 2018, the annual paid leave utilization rate was 69% while average monthly overtime was 24.7 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. Social

Occupational Health and Safety

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 oil and gas exploration, development and production projects, 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 http://www.mitsubishi-exploration.com/en/csr/index.html

2) Mitsubishi Development Pty Ltd. (MDP)

MDP manages coking 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 = SafetyI = 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) http://www.mcferticom.jp/csr/safety.html

Status of Acquisition of OHSAS 18001

Business Group	Name of Company	Business Activities
Global Environmental & Infrastructure Business Group	Chiyoda Corporation	Plant engineering business
Energy Business Group	MC Zhenjiang Anode Solutions Co., Ltd.	Production and sale of anodes for aluminium smelting
	Energi Mega Pratama Inc.	Oil and gas exploration, development and production
	Fairfield Energy Ltd.	Oil and gas decommissioning
	Tomori E&P Limited	Natural gas / condensate development and production
Metals Group	Anglo American Sur S.A.	Copper ore mining, processing and sales
	Compania Minera Del Pacifico S.A.	Iron ore mining, processing and sales
Machinery Group	Mitsubishi Elevator India Private Limited	Elevator business (sales and maintenance)
	MC Lift & Solutions Co., Ltd.	Elevator business (trading)
	Mitsubishi Electric de Colombia Ltda.	Elevator business (sales and maintenance)
	Mitsubishi Elevator Malaysia SDN. BHD.	Elevator business (sales and maintenance)
	Mitsubishi Elevator (Singapore) Pte. Ltd.	Elevator business (sales and maintenance)
	Mitsubishi Elevator Hong Kong Company Limited	Elevator business (sales and maintenance)
	Mitsubishi Elevator (Thailand) Co., Ltd.	Elevator business (sales and maintenance)
	PT Mitsubishi Motors Krama Yudha Indonesia	Automobile manufacturing
	PT. Kansai Paint Indonesia	Automobile paint production and sales
Chemicals Group	Deccan Fine Chemicals (India) Private Limited	Contracted manufacturing of agrochemical intermediates and active ingredients
	MC Ferticom Co., Ltd.	Fertilizer production
	UBE-MC Hydrogen Peroxide Ltd.	Production and sales of hydrogen peroxide
Living Essentials Group	Cermaq Group AS	Salmon farming business
	Princes Limited	Food and beverage production
	Olam International Limited	Agricultural production, collection, processing, trade, port operation
	Cape Flattery Silica Mines Pty. Ltd.	Mining, refinery and sales of silica sand

Main MC Group Companies with OHSAS Certification

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)

	2016.3	2017.3	2018.3
Lost time injuries frequency rate* (Frequency rate of injuries)	0.88	0.45	0.46*
Lost time injuries severity rate* (Severity level of accidents)	0.01	0.00	0.01*
Occupational illness frequency rate* (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))	0.00	0.00	0.00*

* 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)

	2015	2016	2017
Lost time injuries frequency rate	1.75	1.74	1.94
Workplace accident severity rate	0.03	0.03	0.10

* From the Japanese Ministry of Health, Labour and Welfare's "2017 Survey on Industrial Accidents"

Environmental

Other Data

Head Office Clinic Usage

Patients in the fiscal year ended March 2018: (total no. of people)	Approximately 26,000 people per year (Medical examinations 7,200; general medical examinations 17,200; overseas medical consultations, health guidance and others 1,500)
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Health Checkup Results

	2017.3	2018.3
Overseas assignees checkup rate	85%	91%

Stress Check Results (Domestic)

	2017.3	2018.3
Checkup rate	95%	95%

Training and Education Performance

Training course title	Theme	Scope	(2016.3)	Participants (2017.3)	(2018.3)
(1) New upper-level manager seminar	Medical clinic director lectures on safety and health management	General Manager level	23	56	50
(2) Organizational management training	Medical clinic director lectures on safety and health management	Manager level	90	101	138
(3) Intermediate follow-up training for new employees	Lecture on stress management	University graduate employees	(Started from following year)	194	178
(4) Integration training for mid-career hires	Lecture on stress management	Mid-career hires	10	16	6
(5) Instructor training	Lecture on workplace mental health	"Instructor" employees	164	154	195
(6) Domestic assignment orientation	Mental health included as theme in lecture on human resources management. Lecture delivered by legal advisor.	Managers sites/ companies	155	195	221

Independent Practitioner's Assurance

To enhance the reliability of its data, MC has obtained the assurance of Deloitte Tohmatsu Sustainability Co., Ltd., an independent practitioner, for its non-consolidated personnel data*. Reference: Independent Practitioner's Assurance Report (P161)

^{*} In order to enhance data reliability, ESG Data marked with a star (★) for the year ended March 2018 and March 2019 has received independent practitioner's assurance from Deloitte Tohmatsu Sustainability Co., Ltd.

Human Resource Development

Policy

Principles of Human Resource Development

One of MC's goals is to develop future management professionals who possess ethics, foresight, and execution skills. Our approach mainly emphasizes on-the-job-training (OJT) and also incorporates Off-JT (Human Resource Development programs). For OJT, we emphasize systematic career path planning including experience at MC's offices and Group companies, both inside and outside of Japan, so that employees can gain hands-on experience in diverse workplaces. For Off-JT, we offer a range of stepwise programs to help management employees develop the necessary skills for conducting consolidated management of MC Group companies.

Structure	
Officer in Charge	Akira Murakoshi (Member of the Board, Executive Vice President, Corporate Functional Officer, Corporate Communications, Human Resources)
Deliberative Body (A subcommittee under the Executive Committee, a management decision- making body)	Human Resources Development (HRD) Committee Important matters related to human resource development deliberated by the HRD Committee are formally approved by the Executive Committee and put forward or reported to the Board of Directors based on prescribed standards.
Department in Charge	Global Human Resources Dept.

Reference: Diagram of the Sustainability Promotion Framework (P.07)

MC Group HRD Program Structure

FY2018 MC Group HRD Program Structure



Initiatives

Introduction of Human Resource Development Programs

1. Basic Programs (for New Hires–Staff Level)

As a first step towards becoming a management professional, we conduct basic Off-JT programs for professional development where trainees take on roles on the front lines of our business. These programs provide training for acquiring basic business knowledge, communication skills, analytical capabilities and management skills. We also focus on developing the ability to compete on the international stage, which is essential for people who work for a *sogo shosha* such as MC.

Basic Business Skills

To strengthen basic business skills, all new hires are required to participate in two stepwise HRD programs called the "Basic Business Skills Program (BBS)" and the "Advanced Business Skills

Assignment of Global Trainees (Fiscal Year Ended March 2018)

Program (ABS)" in their first three years at MC. These programs give them a general foundation in basic professional skills such as finance, accounting, mergers and acquisitions (M&As), business English and global leadership.

Global Competitiveness

MC's policy is to provide all employees opportunities to train and work overseas early in their careers (typically within their first eight years with the Company). This is intended to strengthen the global competitiveness of our human resources in line with further global business development. The policy is supported by the "Global Trainee Program." The program is centered mainly on OJT overseas, and includes overseas business school assignments as well as language and culture programs. Every year, approximately 120 young employees participate on these assignments.



* The numbers of trainees per region are shown in fractions because some trainees' assignments are divided between more than one country or region.

Human Resource Development

2. Strengthening Management Capability (Middle Management)

As of today, about 2,300 MC employees are working outside of the Head Office at MC offices and Group companies both in Japan and overseas. Middle management training focuses particularly on opportunities for growth through this type of real world experience and on self-development through OJT. Our Off-JT is selective and involves programs that provide employees with experience that is otherwise difficult to gain in the course of their day-to-day work with the goal of helping them develop a management mindset. Through these programs, we aim to cultivate management professionals to lead the MC Group in the future.

Fostering Future Management Professionals

Every year, we have approximately 40-50 mid-level managers attend short-term programs at prominent business schools in the U.S., Europe, and Asia, where they hone their general management skills and build strong networks with other participants from diverse cultures and enterprises. We have a number of in-house stepwise "Joint Programs" designed for the approximately 77,000 employees in MC and the MC Group in and outside Japan. These programs are tailored to help employees develop management thinking, equip them with management skills, and strengthen the MC Group's overall management capabilities.



Number of Participants in Joint Programs

Percentage of participants from MC's offices and MC Group companies (right axis)

Joint Programs

Program for Global Leaders

Retreat-style training offered by overseas business school professors over a total of 10 days to help participants master the management skills necessary to lead their own organization.

Program for Leadership Development

Retreat-style training offered over a total of 5 days in collaboration with an overseas business school to help participants acquire management skills for their role as managers.

3. Strengthening Management Capability (Senior Management)

For senior management, whose foundations of management have been established through both OJT and Off-JT, we run selective training aimed at developing even more sophisticated management professionals who will be responsible for managing MC.

High-Level Training for Management Professionals

The MC Executives' Program for executive candidates is an annual program for developing management professionals that was launched in the fiscal year ended March 2004. Participants primarily take part in workshops where they work in groups to address important challenges to running successful businesses and present their solutions to a panel of executives. The program provides an opportunity for participants to broaden their perspectives, develop their management thinking, and build professional networks by exchanging opinions with other employees who have diverse experience and by hearing lectures from MC executives and those from the general business community.





4. MC Group Values

We are enhancing the collective capabilities of the MC Group's some 77,000 professionals by sharing our values and strengthening networks across companies, Business Groups and countries.

Sharing MC Values

The MC Group Gateway Program has been held since the fiscal year ended March 2011. An orientation program for employees of MC offices and Group companies in Japan and overseas, it is designed to share MC's corporate principles and values, and to foster greater understanding of the MC Group. In the fiscal year ended March 2018, approximately 500 employees took part in the program, bringing the cumulative total to around 3,200. It is held eight times per year in Tokyo, with separate sessions in both Japanese and English. Similar orientation programs are being held in other regions overseas as well in an effort to promote shared values throughout the entire MC Group.

International Transfers

In recent years, we have been transferring more employees hired at MC overseas offices to other countries to meet the growing needs of our global operations. These international transfers provide a wide range of experiences and help to refine employees' global perspectives. At the same time, they give employees a clearer understanding of the MC Group overall and its management philosophy. MC will therefore continue to promote deployments on a consolidated, global base, assigning the appropriate human resources for each position.

Number of Participants in the MC Group Gateway Program







Data is current as of March 31 of each fiscal year until the fiscal year ended March 2018, and is current as of April 1, 2018 for the fiscal year ending March 2019

Performance

Human Resource Development and Training Data

Number of Training Participants (Non-Consolidated Basis)

Program Name	Eligible Employees	2017.3	2018.3
Business Basic Skill Program	1st or 2nd year employees	193	171
Business Advanced Skill Program	3rd year employees	Newly established in the fiscal year ended March 31, 2018	131
Global Trainee Program	2nd year and over employees	127	124
Program for Leadership Development	Manager class employees	42	39
Program for Global Leaders	General Manager class employees	43	35
MC Executives' Program	Managing Director class employees	36	36

Overview of MC's Training (Non-Consolidated Basis)

	Number of Participants
No. of training participants per year*1	2,879
Annual training hours averaged out over typical employee's career*2	62
Total cost of training* ³	2.04 billion yen
Cost per employee*4	333 thousand yen

*1 No. of employees taking skills development programs run by the Global HR Dept. at the Head Office that are designed to foster future management professionals.

*2 Calculated based on a 38-year career starting at the age of 23 and finishing at the age of 60.

*3 Total cost includes internal development costs and billings for training related services, etc. from outside entities.

*4 Total cost of training divided by the total number of employees.

Customer Responsibility

Policy

Responsible Advertising and Marketing

MC engages in responsible advertising and marketing in line with the Three Corporate Principles, the Company's core philosophy, as well as with the Corporate Standards of Conduct, the Social Charter and the Code of Conduct. Through its corporate communications

Advertising

In order to present a consistent corporate image to customers and conduct advertising and promotional activities with the appropriate messaging, content and media, MC has developed a set of internal rules, guidelines and manuals that include specific considerations and stipulate approval and reporting procedures and other important matters. In particular, we take adequate precaution with respect to slanderous or discriminatory expressions, religious and political creeds, the environment, third-party privacy, confidentiality, disclosure and intellectual property rights. We have also created manuals for MC Group companies to ensure consistency across the Group. activities, MC strives to raise its brand value by conveying accurate information to the public while at the same time receiving feedback from external stakeholders with humility and incorporating it into business activities.

Marketing

MC engages in responsible marketing in a manner that respects third parties and their reputation. We use information and language that is easy to understand and make sure to avoid any potential for misunderstandings with our customers. This is accomplished by complying with laws and regulations related to marketing (such as the Japanese Unfair Competition Prevention Act), formulating and complying with internal rules, and conducting training, etc.

Policy and Approach Related to Food Products Businesses

While the MC Group conducts business in a variety of areas, the food products business is most directly connected to consumers. The products we handle also cover a broad range and include processed foods, fresh foods, and beverages. For this business, we have established value chains that cover activities ranging from raw material procurement and processing to product manufacturing, distribution and retail. MC aims to meet the needs of an increasingly diverse and sophisticated consumer group and to respond to mounting concerns over food safety and security.

As we develop businesses closely connected to people's daily lives, it is essential for the growth of the MC Group that we provide products and services that add value for our consumers and that we obtain feedback directly from consumers through our retail businesses including the Lawson convenience store chain. Consumer feedback is reflected back into our raw material procurement and processing, product manufacturing and distribution. Through this process, MC is optimizing and driving forward its businesses with a 'consumer-first' mindset.

In promoting consumer-related businesses, MC recognizes the issues involved (see below) and will conduct initiatives to prevent the occurrence of incidents and to mitigate their impacts.

- · Ensuring food safety
- Ensuring reliability and proper provision of food (providing information on allergens, preventing provision of alcohol to minors, etc.)
- Appropriate handling of customers' personal data

Customer Responsibility

Access to Better Nutrition and Medical Care

The MC Group conducts business activities globally which involve providing consumers with food products and medical services. From upstream raw material procurement to downstream retail, we provide a stable supply of products and services that meet consumer needs in order to help them lead rich and varied lives. With a mission of conducting business activities closely connected to food and medicine, MC strives to ensure safety and security for consumers, thereby providing value that meets social requirements while also contributing to improved access to better nutrition and medical care.

Policy and Approach for Access to Better Nutrition

In emerging countries, nutrient imbalances caused by lifestyle changes, increasing obesity, other lifestyle-related diseases and lower nutrient intake due to eating difficulties caused by aging have all become broad social issues. In emerging countries, hunger and malnutrition brought on by poverty and other conditions are widespread. At the same time, people are becoming more health-conscious. Each of these trends has the potential to create new markets and generate business opportunities, especially in emerging countries. The MC Group recognizes these social issues, and by leveraging the strength of our value chains which range from raw materials to retail as well as our technical capacities in the food science business, we will work to improve, for example, nutrition for elderly people who are nutrient deficient, and to develop and provide nutritious products that meet consumer needs. Furthermore, we will strive to maintain a stable supply of products to prevent consumers from being negatively impacted by supply disruptions.

Policy and Approach to Providing Access to Better Medical Care

The MC Group is undertaking healthcare-related businesses through its Living Essentials Group. In emerging countries, many people lack access to high-quality medical services due to underdeveloped healthcare environments and systems. Meanwhile, in Japan, one pressing issue is that government finances are being strained by worsening business conditions faced by medical institutions and burgeoning social insurance costs, which in turn reflect the aging population and growing medical expenditures. Leveraging the knowledge and networks developed through its healthcare-related businesses over many years, the MC Group is working to address various healthcare issues arising worldwide, with the aim of realizing a society with improved access to better healthcare.

Targets

MC's goal in the life sciences field is to become the world's leading company in the field. We will achieve this by sustaining growth and establishing a robust presence in the food and health sector by further developing the Japanese domestic market through strategic investment and innovative R&D based on our technical capacities, as well as through the provision of safe and reliable products.

Initiatives

Initiatives on a Non-Consolidated Basis

Corporate Website and Corporate Brochure

Given the global presence of the MC Group, MC discloses information through its corporate websites in seven languages* (Japanese, English, Chinese, Portuguese, French, Russian and Korean), and annually publishes its corporate brochure in eight languages (Japanese, English, Chinese, French, Russian, Spanish, Burmese and Vietnamese). The goal is to ensure accurate information disclosure to audiences around the world.

* Including websites of overseas subsidiaries.

Initiatives in the Food Science Business

Initiatives by Mitsubishi Corporation Life Sciences Limited

Elderly people who have difficulty swallowing and individuals suffering from certain diseases are prone to aspiration pneumonia which can result from the mis-swallowing of food. For this issue, Mitsubishi Shoji Foodtech Co., Ltd., an affiliate of Mitsubishi Corporation Life Sciences Limited, is developing formulations that utilize polysaccharide thickener compounding technologies. In the field of medical and nursing care-related foods, formulations which make food softer and easier to swallow and thickening agents added to give food the right thickness for easier swallowing are contributing

System for Responding to Inquiries

MC has created a Frequently Asked Questions (FAQ) page on its corporate website, and strives to respond to inquiries as quickly as possible. In addition, the relevant divisions promptly address customer inquiries via the Head Office's main telephone line.

to the prevention of aspiration pneumonia. The company is also planning business development into low-protein food formulations for kidney disease patients and conducting research on low-sugar concepts utilizing the sweeteners it possesses. In addition, KOHJIN Life Sciences Co., Ltd., in the same business group, develops seasonings and health food ingredients utilizing the power of yeast. The company uses yeast extracts to offer low-sodium seasoning alternatives and is also developing them as supplement ingredients for the health and beauty fields. In this way, the MC Group will continue to develop safe foods in the medical, nursing and healthcare fields, thereby contributing to the betterment of society.

Response to Issues Related to the Food Products Business

Through its Food-Products and related businesses which are directly connected to consumers, the MC Group actively addresses the following issues.

Cermaq Initiatives

Cermaq, an MC subsidiary, considers the provision of healthy and sustainable food to be its core mission. A salmon producer, Cermaq has the ambition to produce healthy and nutritious food to a growing world population and play a role in improving the global food system by engaging in multi-stakeholder partnerships.

Farmed salmon is a part of the solution to challenges related to obesity and unbalanced diets, by being rich in healthy nutrients such as marine omega-3, proteins, vitamins and minerals. It is also a sustainable food product, with a low carbon footprint and an efficient feed conversion ratio compared to other animal proteins.

Cermaq considers salmon farming as a part of the solution to solving the world's food needs and engages actively in partnerships to build best practice and share knowledge across the food industry.

Reference: Cermaq website

https://www.cermaq.com/wps/wcm/connect/cermaq/ cermaq/our-sustainable-choice/sustainability-16/ material-topics

Lawson, Inc. Initiatives

Lawson, Inc., an MC consolidated subsidiary, manages and operates convenience stores. Lawson is most closely connected to consumers within the food products value chain, and conducts the following initiatives to help minimize negative product impact on socially vulnerable groups.

(1) Promoting long-term health

Lawson strives to be the number one community store for healthy eating. The company has introduced a 'Meal Solutions' initiative which aims to provide healthy everyday food. This initiative offers a wide range of meals, makes these meals convenient to purchase, and takes into account health considerations. Thus, it is highly rated by consumers who want not only quick and easy meals but also to pursue or maintain a healthy diet.

(2) Materials procurement and quality management

Lawson's subsidiary SCI, Inc. oversees the company's supply chain management and is responsible for supplying original products that are also safe and reliable. SCI conducts rigorous quality assessments, and in procuring raw materials only selects products that have passed a stringent screening process based on Lawson's quality control standards. In the product manufacturing process, at plants that produce rice products for example, a unique HACCP system for food sanitation management has been established to prevent incidents involving food poisoning or contamination. In this way, Lawson procures safe raw materials and carries out rigorous quality control to prevent any negative health impacts on consumers.

Furthermore, Lawson established the 'LAWSON Farm' project which supplies fresh fruits and vegetables that are safe, reliable and high quality in a stable manner to stores in the Lawson Group. Of the 23 LAWSON Farms in Japan, 22^{*1} have achieved Japan Good Agricultural Practice^{*2} certification as of February 28, 2018.

(3) Preventing the sale of alcohol and tobacco products to minors

To prevent alcohol and tobacco products from being sold to minors, when selling these products, the minimum age is displayed on the cashier screen so that both the customer and the store staff can see and the customer can confirm. Regular training is provided to store employees, while posters and announcements are used in-store to raise customer awareness.

^{*1} All LAWSON Farms except LAWSON Farm Hiroshima Jinsekikogen (which is certified by the Japanese Agricultural Organic Standards (JAS)).

^{*2} Japan Good Agricultural Practice is intended to facilitate the supply of safe and reliable fruits, vegetables and ingredients with control methods for agricultural production processes that are optimal for agriculture in Japan.

(4) Safety Station activities

From crime prevention and disaster preparedness to safety measures and children's health initiatives, there is an ever increasing expectation for convenience stores to play a broader role in society.

To meet these expectations, the Lawson Group participates in the Safety Station activities of the Japan Franchise Association, helping to build safe and secure communities and promoting healthy environments for young people. The company also implements anti-crime measures to combat theft and other crimes, while also supporting women and children who seek safe harbor in-store.

Examples of Safety Station Activities

• Preventing bank transfer scams

Examples include a member of staff preventing a bank transfer scam when noticing suspicious behavior by a customer using an in-store ATM machine, and another staff member questioning the intentions of a customer wanting to send money, thereby preventing a potential refund scam.

• Caring for people with sudden illnesses and senior citizens Examples include administering first aid to a customer who had sudden pain while shopping and accompanying that customer to the hospital, and escorting an elderly customer believed to have dementia back home due to sudden memory loss. An increasing number of stores are able to provide this kind of assistance to customers in need of help.

- · Supporting local crime prevention and
 - disaster preparedness activities

Lawson conducts presentations at elementary schools near to its stores on measures it takes to prevent shoplifting and other crimes. Staff members also act as youth guidance personnel and regularly patrol the streets near middle schools, helping to prevent anti-social behavior. Through such activities, Lawson is contributing to the creation of safe communities and healthy environments for young people.

Reference: Lawson website (Japanese only)

http://www.lawson.co.jp/company/activity/stakeholder/ consumer/safety.html http://www.lawson.co.jp/company/activity/special/

lawsonfarm/index.html

Appropriate Food Labeling Initiatives

When people with food allergies consume an allergen it can trigger anaphylaxis. Similarly, consuming large quantities of certain substances can potentially damage one's health. To prevent such problems, MC strives to label its food products in a way that is easy to understand in accordance with applicable laws and regulations. To ensure that consumers understand product characteristics and are in a position to make appropriate purchasing decisions based on health and other factors, Mitsubishi Shokuhin Co., Ltd., Lawson, Inc. and other MC Group companies make it a top priority to comply with laws and regulations such as Japan's Food Labeling Act. These companies provide information which is easy to understand from the consumer standpoint such as quality labeling, warnings related to alcoholism, acute alcohol poisoning, and underage drinking, as well as clear allergen warnings.

Initiatives for Better Access to Medical Care

As a company engaged in the healthcare sector, MC is involved in the following initiatives with its Group Companies to help provide people in Japan and around the world with better access to healthcare.

Improving Medical Care Access and Standards in Emerging Countries

In 2017, MC formed a hospital management joint venture with Capital Diamond Star Group (CDSG) and Yee Shin Holdings. The joint venture will construct a 300-bed general hospital in Yangon, Myanmar, in order to provide locally rooted, high-quality medical services and raise healthcare standards. MC is committed to helping create conditions that allow people to access advanced medical treatment in emerging countries.

Stabilizing Medical Care in Japan and Raising the Elderly's Quality of Life

MC Healthcare, Inc., an MC consolidated subsidiary in Japan, specializes in improving hospital operations through procurement and inventory control of medical supplies and equipment, group purchasing, and information systems. The company is also applying its experience and expertise in rapidly growing China. By improving and providing solutions to hospital operations, MC Healthcare, Inc. is contributing to the enhancement and stability of Japan's healthcare system.

Nippon Care Supply Co., Ltd. is a pioneering provider of rental equipment and in-home nursing care services. In order to raise the quality of life of the elderly and enable them to continue living independently, the company conducts its core business of renting welfare equipment as well as other businesses including providing meals to day service facilities and other institutions. In doing so, the company is contributing towards a healthy longevity society where all senior citizens can live comfortably and with peace of mind.

Access to Medical Care in Local Communities

As a convenience store closely connected to consumers, Lawson, Inc. is developing its Healthcare Lawson convenience store model to provide daily living-related support with expanded sales of over-the-counter medicines to accommodate healthy lifestyles and an aging society. In addition, Lawson enters into health-related agreements with local governments in order to conduct health exams in the parking lots of Lawson convenience stores for nearby local residents. These exams are normally received at a city hall or a community center. Through initiatives such as these, Lawson provides access to medical care for people who live far from any hospital or pharmacy, and is working to develop its stores so that they can be used with peace of mind by a diverse range of customers.

Overseas Initiatives (Poverty Assistance)

As a global, integrated business enterprise, MC considers what kind of support it can provide through its operations to countries and regions where it is developing business in the mid- to longterm. We are engaged in a variety of programs tailored to local needs in these countries and regions.

Example: Myanmar

Background

The Mandalay and Magway Regions of Myanmar occupy much of what is referred to as the Central Dry Zone. This area receives very little rainfall and does not have well-developed irrigation channels, making it a considerably infertile area. The Dry Zone is, however, inhabited by a large number of low-income farming communities, making this one of Myanmar's biggest social issues.

Details of the Initiative

\bigcirc Agricultural Support Activities

MC became the first private-sector donor to participate in the Livelihoods and Food Security Trust Fund (LIFT) program administered by the United Nations Office for Project Services (UNOPS). The LIFT program provides support to low-income farming communities across Myanmar. Additionally, in collaboration with OISCA International, an NGO specializing in international cooperation, MC has set up a training center for nurturing agricultural leaders in the Mandalay region. Through these forms of support, MC aims to help improve the standard of living of farmers in Myanmar and contribute to the development of farming in the country.

Customer Responsibility

○ Example of Business Expansion in Myanmar

• Food-Related Business

In 2015, MC established Lluvia Limited as a joint venture with Capital Diamond Star Group (CDSG) of Myanmar. Lluvia operates food-related businesses, including a wheat flour business that has Myanmar's top share as well as a beverage business that has strong market recognition. MC will contribute to the stable supply of food and the development of the food industry in Myanmar by enhancing existing businesses and creating new businesses within Lluvia through knowledge transfer from MC and its network of partners.

Hospital Business

In 2017, MC agreed to form a hospital management joint venture with CDSG and Yee Shin Holdings in Myanmar, with plans to construct a 300-bed general hospital in Yangon. Through this joint venture, MC will provide high-quality healthcare services closely attuned to the needs of the regional community, with a view to creating both social and economic value.

Airport Development

MC-Jalux Airport Services Co., Ltd. is a joint venture between MC, JALUX Inc. and Myanmar-based Yoma Development Group Ltd. The joint venture was established to operate and maintain the airport facilities at Mandalay International Airport in Myanmar, including the terminal building and runway (excluding air traffic control). Besides providing safe, convenient airport services, MC aims to contribute to greater social and economic development in Myanmar through airport management.

Corporate Philanthropy

MC has formulated its Corporate Standards of Conduct and Social Charter based on the Three Corporate Principles, the Company's core philosophy, and conducts corporate philanthropy initiatives to improve access to nutrition and medical care.

(1) Mitsubishi Corporation Foundation for the Americas

Mitsubishi Corporation Foundation for the Americas (MCFA) was established in 1991 by Mitsubishi International Corporation (MIC) and MC. The mission of MCFA is to support environmental

initiatives throughout the Americas, encompassing environmental education, biodiversity conservation, environmental justice and sustainable development. Since its establishment, the foundation has contributed a total of \$10.7 million (approx. ¥1.2 billion) to projects throughout the Americas. For example, the MCFA is supporting initiatives such as a Rainforest Alliance project in Peru to promote sustainable farming practices for high-value crops such as brazil nuts and cocoa.

(2) Mitsubishi Corporation Fund for Europe and Africa (MCFEA)

The Mitsubishi Corporation Fund for Europe and Africa (MCFEA) is a UK registered charitable foundation established in 1992 by Mitsubishi Corporation and Mitsubishi Corporation (UK) Plc. (now Mitsubishi Corporation International (Europe) Plc.) Since its inception, the MCFEA has contributed more than £4.6 million (approx. ¥700 million) in grants to environmental and developmental projects in Europe and Africa. Currently, the MCFEA's support includes contributions to a fishery management project in Morocco conducted by the US-based Sustainable Fisheries Partnership, helping to provide stable and sustainable supplies of seafood to the market as a high-quality source of protein.

(3) Supporting independence of small-scale farmers

MC has been providing support for small farming families in an environmentally protected region of the Southern Lowlands of Bahia State in Brazil. This is the first project to be executed based on an MOU signed between MC and the Inter-American Development Bank, the aim of which is to promote collaborative philanthropic activities in Latin America and the Caribbean. These activities are being conducted in partnership with the Odebrecht Foundation in Brazil. MC is also providing assistance to technical schools for agriculture, agribusiness and forestry. These schools teach young people the latest techniques in environmentally-friendly farming and farm management in order to help them achieve self-sufficiency.

(4) Smile Africa Project

MC has been a supporter of this project since it was initiated by Sotokoto magazine in 2009. Its purpose is to collect slightly used athletic shoes in Japan and send them to children in Africa who need them.
Participation in External Initiatives

Cermaq, an MC subsidiary, engages in external sustainability initiatives in line with its strategy, which emphasizes partnerships to find solutions related to the UN Sustainable Development Goals (SDGs). In particular, five goals have been identified as high priority for Cermaq, including Goal 2: Zero hunger and Goal 14: Life below water. Cermaq engages in industry and multi-stakeholder initiatives to find solutions, on different levels:

Examples of initiatives include:

(1) Food industry—FreSH initiative:

Food Reform for Sustainability and Health. Established in January 2017 by the World Business Council for Sustainable Development (WBCSD) and the Norway based EAT Foundation, the FreSH initiative is undertaken with participation by Cermaq in collaboration with 35 other global food companies including Nestle, Unilever and Danone. It aims to accelerate change in the global food system by developing guidelines and recommendations for healthy, sustainable diets and more sustainable food production.

(2) Seafood industry—SeaBOS:

Seafood Business for Ocean Stewardship. Established in 2016 by eight of the world's largest seafood companies (including Cermaq, Thai Union, Nissui, Maruha Nichiro, and Marine Harvest), SeaBOS aims to promote sustainable seafood operations and ensure a healthy ocean. (3) Salmon aquaculture industry— Global Salmon Initiative (GSI):

GSI is a leadership initiative established by global farmed salmon producers. It seeks to provide a highly sustainable source of healthy protein to feed a growing global population, in tandem with minimizing the environmental footprint, and continuing to improve the industry's contributions to society.

In addition, Cermaq is a member of the UN Global Compact. Member companies work to align their strategies and operations with universal principles on human rights, labor, environment and anti-corruption, and take actions that advance societal goals.

Reference: For further information, please see Cermaq's website. https://www.cermaq.com/wps/wcm/connect/cermaq/ cermaq/our-sustainable-choice/partnership-sdgs

Support for the Global Compact (P.06)

Policy

Basic Approach

One of MC's Key Sustainability Issues (Materiality) is "Growing Together with Local Communities," through which MC strives to contribute to regional development through its business and corporate philanthropy initiatives and grow together with the regions and communities where it operates.

Policy on Community Investment

In identifying 'Growing Together with Local Communities' as one of its Key Sustainability Issues, MC recognizes the value of building relationships with communities for the success of its businesses. Furthermore, by growing together with communities through job creation, promoting community development and procuring raw materials from local communities, MC also strives to minimize negative impacts. Growing together with local communities is equally as important as advancing MC's businesses and generating financial return. This represents the true spirit of MC, which seeks to simultaneously generate economic, environmental, and societal value.

Policy on Local Employment and Procurement

MC appreciates that local employment and procurement have an important role to play in building positive relationships with and contributing to the sustainable development of the countries and regions in which it operates (as outlined in ISO 26000, etc.).

MC understands that hiring employees and procuring goods and services from the local areas near to project operations contributes to the sustainable development of the region through local human resource development and through social and economic growth.

As a company with business operations in many countries and regions across the globe, MC will endeavor to make economic contributions through its business by way of local employment and procurement, as well as social contributions through various philanthropic efforts, with the aim of growing together with local communities.

Policy on Mine/Site Decommissioning

MC believes in the importance of minimizing impact on the environment and society when carrying out decommissioning for mining and for oil and gas projects.

When carrying out these projects, in order to ensure that measures for future decommissioning are undertaken smoothly and appropriately, MC will, from initial project planning through to operation, carry out environmental impact assessments in accordance with the laws of the countries and regions in which it operates as well as with international principles.* In addition, MC will engage in dialogue with governments, local communities and other stakeholders in order to develop appropriate decommissioning plans and implement necessary measures such as rehabilitation in order to minimize impact on the environment and communities.

* The ICMM (International Council on Mining & Metals) 10 Principles, etc.

Structure

	Iwao Toide (Member of the Board, Executive Vice President, Corporate Functional Officer, Business Investment Management, Corporate Sustainability, Al/IoT)
Officers in Charge	Akira Murakoshi (Member of the Board, Executive Vice President, Corporate Functional Officer, Public Relations, Human Resources)
	Masakazu Sakakida (Member of the Board, Executive Vice President, Corporate Functional Officer, Corporate Administration, Legal)
Deliberative Body (A subcommittee under the Executive Committee, a management decision- making body)	Sustainability & CSR Committee Important matters related to communities deliberated by the Sustainability & CSR Committee are formally approved by the Executive Committee and put forward or reported to the Board of Directors based on prescribed standards.
Departments in Charge	Corporate Sustainability Dept., Corporate Administration Dept., Corporate Communications Dept.

Reference: Diagram of the Sustainability Promotion Framework (P.07)

Risk Management

When reviewing and making decisions on loan and investment proposals, MC not only takes economic factors into consideration, but also places importance on ESG as well. We also take into account revitalization of the local society and economy, the status of the surroundings such as indigenous people and cultural assets, and related factors. Besides screening new investment and exit proposals, MC also strives to make improvements to existing business investments by monitoring their management practices.

Corporate Philanthropy Activities

In keeping with our belief that MC's sustainable growth cannot be achieved without realizing a sustainable society, we address our Key Sustainability Issues (Materiality) through both business and philanthropy activities.

MC engages in a variety of corporate philanthropy activities in the fields of Global Environment, Public Welfare, Education, International Exchange & Contributions, Culture and Arts, and Earthquake Recovery Efforts. These focus areas closely correlate to two of the Key Sustainability Issues in particular: Conserving the Natural Environment and Growing Together with Local Communities.

Each of our philanthropy activities is conducted with a focus on long-running initiatives in which our employees can take part and which highlight the unique strengths of our company. These contribute to MC's overall pursuit of businesses that generate value for societies.

Employee Volunteer Activities

MC places great emphasis on deepening employee awareness of the importance of giving back to society. We therefore have taken steps to encourage employee participation in volunteer activities, for example, by establishing a volunteer leave system and by holding in-house volunteer programs during lunch hours.



In addition, MC launched a series of relief activities in the immediate aftermath of the Great East Japan Earthquake in 2011, and as of March 31, 2018, approximately 4,700 employees had participated in those activities as volunteers.

Volunteer Token System/ Volunteer Leave System

MC makes donations to public welfare, educational and environmental NPOs or foundations based on a virtual token system. Employees earn tokens by participating in volunteer activities, with each token worth a corporate donation of ¥500. Tokens are awarded not only for volunteer work organized by MC, but also for activities undertaken independently by employees during their private time outside of work.

Employees can take up to five days of leave each year to participate in volunteer activities.



DREAM AS ONE.

-Joining Together to Make Dreams Come True-

MC launched the DREAM AS ONE. Project in 2014 in order to enhance a long-running program aimed at making sports more accessible for people with impairments. During the fiscal year ended March 2018, roughly 30 different sporting events were conducted, including sports classes for children with impairments and classes for training volunteers to assist at sporting events for athletes with impairments. In addition, three of our employees are active in para-sports.

Mitsubishi Corporation Art Gate Program

Young Japanese artists struggle to find opportunities to present their work. In 2008, MC established the Mitsubishi Corporation Art Gate Program with the goal of nurturing young talent. MC invites young artists who graduated within the last three years to submit their artwork to MC for selection. MC purchases the selected works at ¥100,000 each, and after being displayed in internal and external exhibitions, they are auctioned for charity to the general public. The proceeds gained from the auctions fund scholarships for aspiring artists seeking to launch professional careers. As of the fiscal year ended March 2018, MC has purchased around 1,900 works and provided scholarships to a total of 119 active students.

Support through Charitable Foundations

Foundations and Funds	Activities	Year of establishment and paid-in capital (cumulative)
Mitsubishi Corporation Disaster Relief Foundation	The Mitsubishi Corporation Disaster Relief Foundation promotes recovery activities in areas affected by the Great East Japan Earthquake through provision of scholarships and grants, as well as industry revival and job creation.	Established in 2012 Approximately ± 13.5 billion (Including donations through the Mitsubishi Corporation East Japan Earthquake Recovery Fund)
Mitsubishi Corporation Foundation for the Americas (MCFA)	The MCFA supports NGOs and other organizations engaged in ecosystem preservation, sustainable development, environmental justice, and environmental education in the Americas.	Established in 1991 Approximately US 10.7 million
Mitsubishi Corporation Fund for Europe and Africa (MCFEA)	The MCFEA supports NGOs and other organizations involved in environmental conservation, related research and education, and poverty alleviation in Europe and Africa.	Established in 1992 Approximately ± 4.6 million

MITSUBISHI CORPORATION ESG DATA BOOK

Mitsubishi Corporation Disaster Relief Foundation

MC created a ¥10 billion fund to provide financial support to reconstruction activities during the first four years following the Great East Japan Earthquake, and has undertaken a variety of activities in line with the local needs and conditions in affected areas. In spring 2012, we established the Mitsubishi Corporation Disaster Relief Foundation, which took over the scholarship program and reconstruction support grants from the original fund while also working to support industrial recovery and job creation in the affected areas. During the fiscal year ended March 2016, MC decided to donate an additional ¥3.5 billion to fund activities over the next five years. We are continuing our original initiatives and pursuing new projects such as our Fukushima Winery Project, which offers support for the fruit farming industry in Koriyama City, Fukushima Prefecture, through an innovative, vertically integrated business model.

Investing in the Future of the Areas Affected by the Disaster

MC's activities in the fields of industry revival and job creation involve providing financial support (investment and loans). This money must be repaid; an obligation that creates an appropriate sense of tension which we believe contributes to business continuity. However, a key difference of this system from ordinary financing is that payment for the principal and interest is not paid for up to 10 years until the business gets on track. If the business starts to make a profit, MC receives a portion as a distribution of profits. This profit distribution is not retained in the foundation, but is instead donated to regional governmental organizations and other reconstruction support funds in line with our basic policy, so that it can be reused for activities to support the reconstruction of areas impacted by the disaster. By establishing a system to recirculate the reconstruction funds, MC is promoting further progress towards independence for the regional economies.



Mitsubishi Corporation Disaster Relief Foundation Activities

* Total financial amounts including the activities of the Mitsubishi Corporation East Japan Earthquake Recovery Fund

Examples of Support

Hamanto Fisheries Cooperative (Ishinomaki, Miyagi Prefecture)



Mitsubishi Corporation Foundation for the Americas and Mitsubishi Corporation Fund for Europe and Africa

Through the Mitsubishi Corporation Foundation for the Americas (MCFA) and the Mitsubishi Corporation Fund for Europe and Africa (MCFEA), MC supports a wide range of initiatives focusing on environmental conservation, education and poverty alleviation.

The MCFA is a foundation that seeks to address environmental and societal issues in the Americas. It provides support to NGOs and others engaged in activities related to conservation of biodiversity, sustainable development, environmental justice, and environmental education. Since its establishment in 1991, the MCFA has spent approximately US\$10.7 million. Projects supported to date include the US-based Wildlife Conservation Initiative's fisheries improvement and wildlife management initiative in the Amazon river basin, as well as climate change-related research activities.

The MCFEA is a fund that seeks to address environmental and societal issues in developing countries in Europe and Africa. The MCFEA supports NGOs and others engaged in activities related to environmental conservation, environmental education and research, and poverty alleviation. Since its establishment in 1992, the MCFEA has spent approximately £4.6 million. Currently, the MCFEA supports initiatives including a sustainable cocoa farming project by Rainforest Alliance in the Ivory Coast, a wildlife conservation project by the IUCN in Tanzania, and a fishery management project by the Sustainable Fisheries Partnership in Morocco.

Reference: For further details, please refer to MC's website. https://www.mitsubishicorp.com/jp/en/csr/contribution/

Mitsubishi Corporation International Scholarship for Studies in Japan

MC has been offering this scholarship program since 1991 with the aim of assisting international students who are studying at Japanese universities and are expected to become future global leaders. In 2008, MC expanded the scope of the program to cover approximately 100 students each year. As of the fiscal year ended March 2018, a total of 1,306 students had been awarded these scholarships.

In addition to the scholarship itself, each year MC provides an opportunity for recipients to tour sites related to Mitsubishi, as well as to attend a group gathering with fellow scholarship recipients and a reception with MC employees. Through these activities, MC provides the students with various opportunities to develop their careers and deepen their understanding of Japan.

Support for University Students around the World

In addition to the Mitsubishi Corporation International Scholarship for Studies in Japan, MC started the MC International Scholarship in 2000 with the aim of supporting overseas university students. As of the fiscal year ended March 2018, a total of 7,662 students have been awarded these scholarships. Aiming to help nurture the young leaders of tomorrow, MC will continue to provide various support in educational fields around the world.

Examples of Initiatives

Local Procurement in the MDP Business

Since its establishment in 1968, MC's wholly owned subsidiary Mitsubishi Development Pty Ltd (MDP) has conducted resource mining operations in Australia, particularly for coal, while actively undertaking community-based activities. As part of the coal business in Queensland, MDP has implemented a local buying program for the procurement of equipment and services from local small businesses. Around 740 suppliers have participated in the program, leading to the creation of around 5,500 jobs. The program generates economic benefits of around A\$70.0 million per year.



Mine Closure Initiatives

When closing mines, MC develops responsible mine closure plans that take into account social and environmental factors.

While complying with laws and regulations, MC strives to minimize its impact on the environment and society by communicating with governments and local residents, developing appropriate mine closure plans, and implementing necessary rehabilitation measures.

MC has developed mine closure plans ahead of their closure for two of its flagship mining projects: the BMA coal mine in Australia and the Escondida copper mine in Chile. Both plans have been reviewed by government officials and field experts and include environmental impact reports. When implementing such plans, MC will make sure to monitor operating conditions and any legislative developments and make any changes where necessary.

Community Investment

<Mozal Aluminum Smelting Project in Mozambique> MC owns Mozal S.A., an aluminum smelting company in Mozambique, through a joint investment with the government of the Republic of Mozambique, the Australian resources company South32 Limited, and the Industrial Development Corporation of South Africa.

Contribution to Mozambique

Most of the aluminum produced by Mozal is exported from Mozambique to other countries. The aluminum produced at Mozal accounts for around 20–30% of the country's total aluminum export. Today, aluminum is Mozambique's top export.

Mozal has contributed significantly to Mozambique's economy, helping to boost the country's GDP per capita by more than threefold over the past 25 years since the end of the civil war. The country's enormous growth is often referred to as the "Miracle of Mozambique."

Job Creation, Education and Training

Mozal currently employs approximately 1,200 full-time employees. Furthermore, the Mozal project has provided indirect employment opportunities to upwards of 10,000 people including subcontractors and stevedores. Locally hired Mozambicans make up more than 95% of the plant's workforce. Mozal has been recruiting and providing robust education and training to employees since construction of the plant began in 1998. Notably, Mozal conducts extensive education and job training for all of its employees. This is both in an effort to ensure high product quality as well as to give employees necessary health and safety information. The project endeavors to increase opportunities for employees to discuss these matters, and at the same time has also laid out a smooth reporting system throughout the organizational structure. These initiatives have earned the company a strong reputation for developing skilled employees through its education and training initiatives. In addition, secondary processing companies that process Mozambique's aluminum within the country have also begun operations since 2014, thereby contributing further to the region's economic development.

Contribution to Local Communities

Mozal places great emphasis on social contribution activities. Through annual funding of around ¥200 million, Mozal engages in activities such as supporting small businesses in creating employment opportunities, putting in place mechanisms to support education and public health, and activities in other areas such as sports, culture and infrastructure. Examples include the construction of schools and anti-malaria clinics, as well as the provision of HIV education. Mozal also supports local economic activities through the promotion of local agriculture and the commercial sales of local crafts. Mozal has contributed over ¥4 billion to fund these activities on a cumulative basis. Going forward, Mozal remains committed to contributing to local communities through these initiatives.

<Silica Sand Production at Cape Flattery Silica Mines>

Cape Flattery Silica Mines Pty. Ltd. (CFSM), a wholly owned subsidiary of MC, is located in Queensland, Australia and has supplied silica sand to users in East Asia and Southeast Asia for over 50 years since its establishment in 1967. Currently one of the world's largest silica mines, CFSM ships over 2 million tons of silica sand annually to glassmakers and other customers.

Contributions to the local community

1. Coexisting with aboriginal owners

The land where CFSM operates is owned by aboriginal owners. Accordingly, besides paying royalties to aboriginal owner organizations, CFSM also prioritizes aboriginal owners for employment, offers financial assistance for vocational training, provides scholarships, supports local infrastructure construction and conducts other initiatives in order to coexist with aboriginal owners. Out of the company's roughly 90 employees, aboriginal owners make up more than one third.

2. Coexisting with nature

CFSM conducts replanting/greening of mining areas, with four fulltime employees devoted to rehabilitation activities. The company collects seeds from plants that grow naturally in the area and then plants and raises them in a designated nursery. After the mining is completed, they are planted back in the mining area. By spending

3-4 years to restore the site back to the original condition full of greenery, complete with trees and other natural vegetation, CFSM is able to coexist with the natural environment.

To date, the total area that has been rehabilitated, including areas still in progress, amounts to 232 hectares.

CFSM will carry on with these activities and continue to develop the mine while minimizing negative impacts to the local environment.

Applications for Silica Sand

The main applications for silica sand include glass, foundries and chemicals. However, with environmental issues gaining attention worldwide, CFSM is also responding to market needs by increasing the supply of materials to solar panel glass producers, primarily in China. Given global awareness of sustainability issues related to mining, including damage to the environment and impacts to biodiversity, mining activities are being restricted by strengthened environmental regulations in each country. Despite this trend, CFSM's strengths are being recognized, demonstrating results with its sustainable operations that pay consideration to the environment, as well as by supplying a stable quality and volume of product. Going forward, CFSM will continue indirectly supporting the proliferation of clean energy.

Other Reference Data

Donation Amounts			(Unit: ¥ million)
Item	2016.3	2017.3	2018.3
Social contributions, etc.	1,625	1,581	1,615
Recovery support*1	1,732	564	1
Political donations*2	28	28	28
Total	3,385	2,173	1,644

*1 Amount includes MC's contributions to the Mitsubishi Corporation Disaster Relief Foundation and donations to other organizations involved in recovery support. For more information on the activities of the Mitsubishi Corporation Disaster Relief Foundation, please see p110.

*2 The amount of political donations made to political party fund management organizations. MC conducts political donations as part of its corporate philanthropy initiatives.

Social

Supply Chain Management

Supply Chain Management

Policy

Overall Policy

Mitsubishi Corporation (hereafter 'MC'), as a global company with business in a wide variety of products and services, has established the Mitsubishi Corporation Policy for Sustainable Supply Chain Management, a policy which outlines MC's actions to address

(1) Forced Labor

Suppliers shall employ all employees of their own free will with no employee being subject to forced or bonded labor.

(2) Child Labor

Suppliers shall not employ people under the minimum legal working age of the country in question.

(3) Safe and Healthy Working Environments

Suppliers shall work to provide employees with safe and healthy working environments.

(4) Freedom of Association and Collective Bargaining

Suppliers shall respect the right of employees to associate freely and engage in collective bargaining as methods of negotiating working environments, wages and other matters with employers.

(5) Discrimination

Suppliers shall strive to ensure equal opportunities in the work place and shall not engage in discrimination with regard to recruitment and employment practices.

(6) Abuse and Harassment

Suppliers shall respect employees' human rights and must not tolerate abuse or any form of harassment.

(7) Working Hours

Suppliers shall ensure that employees' working hours and use of leave entitlements are appropriately monitored and that excessive overtime labor is prohibited, so as not to infringe upon any statutory regulations. human rights, labor rights, and environmental issues in the supply chain. This policy serves to convey MC's fundamental perspective to its suppliers around the world, and expects all suppliers to understand, embrace and abide by it.

(8) Suitable Remuneration

Suppliers shall pay employees at least the statutory minimum wage, endeavor to pay at least the living wage, and shall not unreasonably reduce wages.

(9) Anti-Corruption

Suppliers shall engage in fair business practices, avoid corruption including bribery and extortion, and comply with applicable laws and regulations.

(10) Environment

Suppliers shall endeavor to protect the environment and consider the impacts of their business activities on local communities and ecosystems, while paying special attention to energy use efficiency, climate change issues such as greenhouse gas emissions, sustainable use of resources, waste reduction, and air, soil and river pollution.

(11) Information Disclosure

Suppliers shall disclose information with respect to the aforementioned matters in a timely and appropriate manner.

Reference: Mitsubishi Corporation Policy for Sustainable Supply Chain Management

http://www.mitsubishicorp.com/jp/en/csr/management/ supplychain.html Environmental

Social

Green Procurement Policy

As MC conducts office activities in line with its Environmental Policy, the company is taking the following actions in order to proactively show consideration for the environment through all types of procurement activities with the aim of reducing its impact on the environment. These actions are based on the Green Purchase Guidelines, which lay out in writing green purchase methods.

- 1. Avoid unnecessary procurement
- Place emphasis on "environmental consideration" together with function/cost at the time of procurement, and select green products whenever possible which satisfy the following:
 - (1) Those using primarily recycled/reused raw materials
 - (2) Those which reduce resource and energy costs and have a lower environmental impact throughout the production/use/ disposal lifecycle stages
 - (3) Those which do not use hazardous chemicals, or are making efforts to reduce such substances
 - (4) Those with an established recycling system

- Make efforts to reduce environmental impact from packing and transport during procurement wherever possible
- 4. Strive to reuse materials and curb new procurement

Furthermore, the guidelines also stipulate that when selecting products with special procedures required by law (home electronics, etc.), the company will confirm whether or not the product takes into account environmental considerations by referencing catalogues and other sources. Furthermore, when selecting products such as stationery, printing paper and furniture, the company will also confirm by referencing catalogues and other sources whether the product is certified (with an official mark) as having met environmental regulations/standards.

Structure

Officer in Charge	Iwao Toide (Member of the Board, Executive Vice President, Corporate Functional Officer, Business Investment Management, Corporate Sustainability, Al/IoT)
Deliberative Body	Sustainability & CSR Committee
(A subcommittee under the Executive Committee, a management decision- making body)	Important matters related to supply chain management deliberated by the Sustainability & CSR Committee are formally approved by the Executive Committee and put forward or reported to the Board of Directors based on prescribed standards.
Department in Charge	Corporate Sustainability Dept.

Reference: Diagram of the Sustainability Promotion Framework (P.07)

Each year, the methods and results of MC's supply chain management are reported to the Board of Directors. In addition to key policies being determined by the Executive Committee, the company's management decision-making body, the Corporate Functional Officer in charge of Corporate Sustainability is regularly briefed on sustainability-related topics including the latest external developments and the status of stakeholder dialogues. Social

Supply Chain Management

Risk Management

MC regularly conducts surveys of suppliers, with a focus on those in industries where social risks including human rights and labor conditions, as well as environmental risks are considered higher such as marine/agricultural products and apparel, in order to monitor their compliance with the Mitsubishi Corporation Policy for Sustainable Supply Chain Management. Products subject to this assessment are determined based on external developments by the two criteria of country/region of origin and product type.

MC asks suppliers questions that take into account the specific issues and risks of the products handled by each supplier, with a focus on aspects including "existence of policies, compliance with laws and regulations", "prevention of forced labor, child labor and discrimination towards workers", "environmental protection" and "information disclosure". In addition, MC employs a system to determine suppliers that may have issues or require assistance based on the results of each questionnaire response. Following this, MC considers and decides whether additional surveys or on-site inspections are necessary.

In the event that MC confirms, through additional surveys or on-site inspections, points that should be rectified or improved in relation to the Policy, in addition to requesting the relevant supplier to take corrective measures, MC also provides guidance and assistance as necessary. If MC determines that a resolution is unlikely even after providing continuous guidance and assistance, MC will review its business relationship with the relevant supplier.

Risk Assessment

Supply Chain Surveys

New Suppliers

New suppliers are provided with the Mitsubishi Corporation Policy for Sustainable Supply Chain Management, and MC confirms compliance by conducting surveys and, when necessary, supplier visits as well.

Existing Suppliers

MC conducts regular surveys of suppliers to continuously monitor the status of their compliance with this policy and to strengthen communication with suppliers. Furthermore, MC visits suppliers to confirm the status of their activities when it determines that site visits are necessary based on the regions where suppliers are active and their business activities.

MC continuously monitors existing suppliers to identify those that pose a high degree of environmental and social risk in line with this policy, for the purpose of verifying the appropriateness of current initiatives.

Going forward, MC will incorporate the results of this reevaluation process into its regular assessments of suppliers, with the goal of ensuring the effectiveness of the supplier surveys.

Screening for Loan and Investment Proposals

In order to ensure that loan and investment proposals do not cause or contribute to adverse human rights impacts, they are vetted through an internal screening process which considers not only economic aspects but also ESG factors including human rights. In particular, for proposals to be deliberated by committees such as the Board of Directors and the Executive Committee, by having the General Manager of the Corporate Sustainability Department participate as a member of the Investment Committee, MC has put in place a screening system that reflects potential environmental and social impacts in decision-making. MC screens for ESG risks taking into account various human rights standards including the International Finance Corporation (IFC) guidelines and the Guidelines for Confirmation of Environmental and Social Considerations published by the Japan Bank for International Cooperation (JBIC). Besides screening new investment and exit proposals, MC also strives to make improvements to existing business investments by monitoring their management practices.

Initiatives

Incorporating Policy Into Initiatives

Many employees at MC have the opportunity to undertake trading activities such as purchasing and sales, or to support such activities at some time in their careers.

For this reason, MC strives to deepen the knowledge of all employees as buyers by explaining MC's corporate philosophy, including respect for human rights in the supply chain. We also integrate the relevant supply chain policy into buyer training such as programs geared toward specific levels of management including those for new employees as well as training on trading practice.

Reference: FY2017 Slavery and Human Trafficking Statement 5. (A) Training and Awareness Raising http://www.mitsubishicorp.com/jp/en/csr/management/ pdf/slavery_and_human_tracking_statement_en.pdf

Data on RSPO-Certified Palm Oil

	2016.3 results	2017.3 results	2018.3 results
Book and Claim method	-	-	-
Mass Balance method	8,950.00	6,950.00	6,130.00
Total volume of palm oil handled	312,000.00	283,000.00	309,300.00
Ratio (%)	2.87	2.46	1.98

Scope: Non-consolidated basis and a portion of business investments

Reference: RSPO ACOP Report

http://www.rspo.org/members/69/mitsubishi-corporation

Data on ASC-Certified Products

			(Units: Thousand tons)
	2016.3 results	2017.3 results	2018.3 results
Production capacity of ASC-certified sites*	21	68	121
Actual sales volume of farmed salmon	163	137	158

ASC: Aquaculture Stewardship Council

Scope: MC consolidated subsidiary Cermaq

* Maximum farmed salmon volume as of December 31 for each fiscal year

Data on FSC[®] CoC-Certified Products

	2018.3 results
Wood chips with FSC CoC certification	100%

FSC: Forest Stewardship Council[®], License Code: FSC[®]-C016424 FSC CoC: Certification for processing/distribution process Scope: Non-consolidated basis (Units: tons)

Supply Chain Management

Engagement with Suppliers

If a violation of the supply chain procurement policy is confirmed, MC will demand that the relevant supplier implement corrective measures and will integrate this policy with relevant suppliers through training and assistance as necessary. For example, by sharing best practice examples from its business investees and leading industry initiatives with suppliers, MC aims to strengthen the environmental and social activities of its suppliers and build solid relationships with them. If MC determines that the supplier is unlikely to implement corrective measures even after providing continuous training and assistance, MC will review its business relationship with the relevant supplier.

Reference: Mitsubishi Corporation Policy for Sustainable Supply Chain Management, 3. Response to Compliance Violations http://www.mitsubishicorp.com/jp/en/csr/management/ supplychain.html

MC conducts annual surveys of suppliers worldwide, including those industries where environmental and social considerations are particularly impactful, such as marine and agricultural products and apparel, in order to monitor their status of compliance with the Mitsubishi Corporation Policy for Sustainable Supply Chain Management. In the fiscal year ended March 2018, MC conducted its annual survey for the fiscal year ended March 2017, and replies were received from 332 companies in 30 countries and regions including China, Myanmar and Thailand. Respondents answered questions pertaining to matters such as regulations and legal compliance; prohibition of forced labor, child labor and discrimination; environmental conservation and information disclosure. Based on the results of this survey, MC conducts additional surveys, on-site inspections and other measures for a number of suppliers.

The communication with suppliers achieved through the surveys and site visits provides a valuable opportunity to deepen the suppliers' understanding of MC's stance on sustainability. Therefore, MC will continue to deepen communication with each supplier and provide training and assistance to suppliers as necessary.

Region	Number of surveys distributed	Number (%) of suppliers MC is working with to share concerns, solve issues, etc.
Asia/Oceania	292	28(10%)
The Americas	26	4 (15%)
Europe, Middle East, Africa	14	3 (21%)
Total	332	35 (11%)

Reference: Surveys and Supplier Visits

http://www.mitsubishicorp.com/jp/en/csr/management/ supplychain.html

Communication with Suppliers - Improving Understanding of Best Practice -

In the year ended March 2018, MC employees visited two suppliers in Vietnam: Viet Tien Garment, a garment factory, and Vinh Hoan Corporation, a company involved in aquaculture and processing of pangasius. Interviews were conducted with employees and management executives in order to cultivate a better understanding of best practice in each industry.

At the Viet Tien Garment factory, through interviews with management MC was able to confirm that sustainability has been integrated into the company's core strategy. As part of its strategy to improve efficiency, Viet Tien Garment is in the process of setting energy-saving targets and strengthening its occupational health and safety (H&S) standards. In addition to interviews, MC visited Viet Tien Garment factory and recognized

that an H&S manual is distributed to workers and H&S signs are clearly posted around the factory to prevent accidents. Factory floors are kept clean at all times to prevent personal



Garment factory inspection

injuries, and working hours are managed by a fingerprint authentication system to prevent overtime.

Vinh Hoan Corporation also takes a serious approach to

sustainability as their management policy. The company has acquired several certifications such as ASC^{*1} and BAP^{*2} as part of its efforts to differentiate itself from its competitors. During the site visit, MC recognized that hygiene standards were

observed properly (including the use of worker uniforms), and also confirmed that its wastewater treatment process is independently verified by a third-party. Although an H&S minor



Pangasius aquaculture and processing facility inspection

issue was identified during the visit, improvement measures werw promptly agreed upon and adopted soon after the visit.

As a result of these visits, MC is confident that our two Vietnamese suppliers are committed to strong sustainability standards and are working to apply them on the ground through ongoing training and structural improvements. We wish to reach out to our Group Companies to encourage similar standards. Working in partnership with our suppliers, MC will continue to promote sustainable operations across the whole MC Group.

*1 Aquaculture Stewardship Council: Certification program for sustainable aquaculture. *2 Best Aquaculture Practices: Certification program for safe and sustainable aquaculture.

External Collaboration

Cermag Initiatives

Cermaq, an MC consolidated subsidiary, is committed to ensuring high standards related to the social and environmental impact of its business. The company has established a Supplier Code of Conduct, taking into account the principles of MC's Policy for Sustainable Supply Chain Management, to ensure responsible practices throughout the supply chain, and which describes the minimum standards that all Cermaq's suppliers are expected to uphold. Cermaq expects its suppliers to request similar standards for their suppliers and subcontractors.

Cermaq expects all its suppliers to comply with requirements in the areas of national legislation, human rights, labour rights, health and safety, anti-corruption, the environment, food quality and safety, management systems, and implementation. In the area of the environment, adverse impact from the operations of the supplier on the community, the environment, and natural resources are expected to be minimized while safeguarding the health and safety of the public. Adverse impact may include pollution, use of limited resources, deforestation, release of chemicals and other materials to the ground, sea or air and which pose a hazard if released into the environment. To minimize the risk, including reducing chemical use in fish farming, suppliers are expected to identify, monitor and control the environmental impact of their operations.

Reference: Cermaq Supplier Code of Conduct

Social

Mitsubishi Corporation Packaging Ltd. Initiatives

Mitsubishi Corporation Packaging Ltd. (MP) handles Forest Stewardship Council®(FSC®)-certified products (corrugated board, printing and communication paper, white paperboard, etc.). MP confirms whether or not its paper suppliers have obtained this certification, which requires third-party audits, in order to ascertain

Lawson, Inc.

Lawson, Inc., an MC consolidated subsidiary, provides freshly brewed coffee in Lawson convenience stores under the MACHI café brand. MACHI café's coffee is made exclusively^{*2} from beans from Rainforest Alliance^{*1} Certified[™] farms. Lawson also conducts activities to popularize and raise awareness through activities such as participating in the Rainforest Alliance Consortium, which was set up through a collaboration between the Rainforest Alliance and companies that offer Rainforest Alliance Certified[™] products. Lawson, as a member of this initiative, hosts symposium events and promotional campaigns.

Princes

Princes, an MC consolidated subsidiary, is taking proactive steps toward creating an ethical supply chain, such as having been the first major food manufacturer in the UK to join the Ethical Trading Initiative, which aims to improve working conditions in the supply chain.

Furthermore, by assessing supplier information registered into the supply chain management and sharing platform SEDEX, the

the level of social and environmental risk.

MP also aims to differentiate itself from competitors by obtaining FSC Chain of Custody (CoC) certification and by adhering to its requirements to procure and sell FSC-certified products. License Code: FSC^{\otimes} -C007960

- *1 Established in 1987, Rainforest Alliance is an international non-profit organization devoted to environmental protection. The Rainforest Alliance Certification is granted only to farms that satisfy strict criteria, including criteria for environmental conservation and improving the livelihoods of farm workers.
- *2 Excludes Single Origin Series and Decaffeinated Series.

Reference: Lawson's Corporate Website http://lawson.jp/en/csr/special_feature/

> Living in Harmony with Communities: Initiatives Report 2018 (P.11) http://lawson.jp/en/csr/report/pdf/es_activ2018_e.pdf

company strives to identify labor risks at an early stage and take necessary steps for improvement.

(All manufacturing facilities owned by Princes are members of SEDEX.)

Reference: Princes Ethical Trade Policy http://www.princesgroup.com/about-princes/ our-responsibilities/

Supply Chain Management

Olam

Olam International Limited (Olam), an MC affiliate company, has built a strong business framework in supplying sustainable materials through its corporate philosophy "Re-imagining Global Agriculture – Growing Responsibly." Olam defines its economic business growth as being achievable only through appropriate consideration for the environment and society, and has accordingly identified 10 material areas: Economic Opportunity, Safe and Decent Work, Education and Skills, Health and Nutrition, Diversity and Inclusion, Climate Action, Healthy Eco-systems, Healthy Soils, Water, and Reduced Waste.

As a specific example, for 11 commodities including cocoa, coffee, sesame, nuts, cotton, rice and sugarcane, the company implements an initiative called the Olam Livelihood Charter (OLC) which supports livelihood improvements for over 360,000 small-holder farmers in 21 countries worldwide by providing agricultural training, securing market access, financing projects, improving local infrastructure, and more. In terms of volume, the initiative affects around 1.4 million tons, approximately 10% of Olam's total purchase volume (FY2016).

Taking cocoa, one of Olam's main products, as an example, the company provided agricultural advice and labor training specifically on tackling social issues such as child labor conducted by the support of specialized in-house trainers to more than 180,000 farmers, and also built nurseries in the key producing regions of Ghana and the Ivory Coast in the fiscal year ended December 2017. As a result of initiatives such as these, improvements were achieved in crop yield and quality. Furthermore, Olam is tackling social issues by providing such sustainable materials indirectly to consumers.

Olam has received numerous awards in recognition of these efforts, including from Fortune Magazine's Change the World 2016 corporate rankings. Olam's CEO Sunny Verghese was also recently appointed chairman of the World Business Council for Sustainable Development (WBCSD*), which further evidences the company's high global acclaim for its sustainability efforts.

* In addition, members of Olam's sustainability team are appointed as co-leads in various working groups such as Climate Smart Agriculture working group of WBCSD.

 Reference:
 Please visit the following links for details on Olam's sustainability initiatives:

 Olam Sustainability Framework

 https://www.olamgroup.com/sustainability/

 sustainability-framework.html

 Olam Livelihood Charter

 http://olamgroup.com/sustainability/

 olam-livelihood-charter.html

Corporate Governance

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Corporate Governance

MC's Basic Policy on Corporate Governance

MC's corporate philosophy is enshrined in the Three Corporate Principles. Through corporate activities rooted in the principles of fairness and integrity, MC strives to continuously raise corporate value. MC believes that by helping to enrich society, both materially and spiritually, it will also meet the expectations of shareholders, customers and all other stakeholders.

In order to achieve these goals, MC recognizes strengthening corporate governance on an ongoing basis as an important management issue as it is a foundation for ensuring sound, transparent and efficient management. MC, based on the Audit & Supervisory Board System, is thus working to put in place a corporate governance system that is even more effective. This includes strengthening management supervision through such measures as appointing Outside Directors and Outside Audit & Supervisory Board Members who satisfy the conditions for Independent Directors or Independent Audit & Supervisory Board Members, and establishing advisory bodies to the Board of Directors where the majority of members are Outside Directors, Outside Audit & Supervisory Board Members and Outside Members. At the same time, MC uses the executive officer system, etc., for prompt and efficient decision-making and business execution.



Corporate Governance Framework (As of July 1, 2018)

As a company based on the Audit & Supervisory Board Member System, MC's Board of Directors has the dual functions of decision-making and supervision with regard to business execution. In the future, the Company plans to further enhance the board's monitoring function. Furthermore, as consolidated management deepens, the board will monitor the status of consolidated strategies and management more closely. Specifically, the Board of Directors will lead MC's sustainable growth by 1) enhancing its deliberations on Company-wide strategies and particularly important matters by concentrating on important projects and 2) taking a more sophisticated approach to monitoring of Corporate Staff Section and Business Group management, and business investees.

Board of Directors

The Board of Directors is responsible for making decisions concerning important management issues and overseeing business execution. In-house Directors utilize their rich experience of working within MC and Outside Directors utilize their practical, objective and professional perspectives to ensure appropriate decision-making and management oversight.

Composition of the Board of Directors and the Policy for Appointing Nominated Directors

To ensure MC's decision-making and management oversight are appropriate for a company involved in diverse businesses and industries in a wide range of fields, several Directors are appointed from both within and outside MC with the depth of experience and high levels of knowledge and expertise needed for fulfilling their duties.

More specifically, in addition to the Chairman of the Board and President and CEO, MC's In-house Directors are appointed from executive persons responsible for Company-wide management, Corporate Staff Section operations, and other areas. Outside Directors are appointed from those who possess a practical perspective of highly experienced officers and those who possess an objective and professional perspective with a deep insight into global developments and socio-economic trends.

In principle, the Board of Directors is an appropriate size for conducting deliberations, with one-third or more being made up of Outside Directors.

Composition of the Board of Directors

Board of Directors' Structure (As of July 1, 2018)

Total	13
Number of non-executive and non-independent Directors (Chairman of the Board)	1
Number of Executive Officers	7
Number of Outside Directors (number of women)	5 (1)

Operation of the Board of Directors (As of July 1, 2018)

The Board of Directors includes Audit & Supervisory Board Members in addition to Directors. The Board operates as follows:

Position	Director	Audit & Supervisory Board Member	Total
Chairman (Non-executive, non-managerial)	1	_	1
Number of Executive Officers/Number of in-house Audit & Supervisory Board Members	7	2	9
Number of independent Directors/independent Audit & Supervisory Board Members (number of women)	5 (1)	3 (1)	8 (2)

Board of Directors Structure (As of July 1, 2018)

Ken Kobayashi	2016 Chairman of the Board (present position) 2010 President and Chief Executive Officer 1971 Joined MC	Mitsumasa Icho*1	2018 Executive Vice President, Corporate Functional Officer, Regional Strategy for Japan, (Concurrently) General Manager, Kansai Branch (present position) 1982 Joined MC
Takehiko Kakiuchi*1	2016 President and Chief Executive Officer (present position) 1979 Joined MC	Akihiko Nishiyama ^{*2}	2018 Professor, Ritsumeikan University (present position), 2015 Member of the Board, MC (present position), 2013 Adjunct Professor, Hitotsubashi University (resigned in March 2018), 2004 Professor, Dept. of International Liberal Arts, Tokyo Jogakkan College (resigned in March 2013), 1975 Joined Tokyo Gas Co., Ltd. (resigned in March 2015)
Kanji Nishiura ^{*1}	2018 Executive Vice President, Corporate Functional Officer, Global Strategy & Coordination, Global Research, International Economic Cooperation, Logistics Management (Concurrently) Regional CEO, Asia & Oceania (present position) 1980 Joined MC	Hideaki Omiya*²	2016 Member of the Board, MC (present position) 2013 Chairman of the Board, Mitsubishi Heavy Industries, Ltd. (present position) 2008 President and CEO, Mitsubishi Heavy Industries, Ltd. 1969 Joined Mitsubishi Heavy Industries, Ltd.
Kazuyuki Masu ^{*1}	2017 Executive Vice President, Corporate Functional Officer, Chief Financial Officer, IT (present position) 2016 Executive Vice President, Corporate Functional Officer, Chief Financial Officer 1982 Joined MC	Toshiko Oka*²	2016 Member of the Board, MC (present position) 2016 CEO, Oka & Company Ltd. (present position) 2005 President and Representative Director, ABeam M&A Consulting Ltd. (resigned in March 2016) 1986 Joined Tohmatsu Touche Ross Consulting Limited (currently ABeam Consulting Ltd.) (resigned in August 2012)
Iwao Toide	2018 Executive Vice President, Corporate Functional Officer, Business Investment Management, Corporate Sustainability, Al/loT (present position) 2017 Executive Vice President, Corporate Functional Officer, Business Investment Management, Corporate Sustainability 1981 Joined MC	Akitaka Saiki ^{*2}	2017 Member of the Board, MC (present position) 2016 Retired from Ministry of Foreign Affairs of Japan 1976 Joined Ministry of Foreign Affairs of Japan
Akira Murakoshi	2017 Executive Vice President, Corporate Functional Officer, Corporate Communications, Human Resources (present position) 1982 Joined MC	Tsuneyoshi Tatsuoka*²	2018 Member of the Board, MC (present position) 2015 Retired from METI 1980 Joined the Ministry of International Trade and Industry (present Ministry of Economy, Trade and Industry (METI))
Masakazu Sakakida*1	2017 Executive Vice President, Corporate Functional Officer, Corporate Administration, Legal (Concurrently) Chief Compliance Officer, Officer, Emergency Crisis Management Headquarters (Japan & Overseas/New Infections Diseases, Compliance) (present position) 1981 Joined MC	Article 2, Item 15 of the C conditions for Independen	the conditions for Outside Directors as provided for in Companies Act. Also indicates the fulfillment of the It Directors/ Auditors as specified by Tokyo Stock tock exchanges in Japan as well as selection criteria

Reference: Please refer to "Selection Criteria for Outside Directors and Outside Audit & Supervisory Members" on the MC website for thoughts regarding independence in selection criteria for Outside Directors.

(http://www.mitsubishicorp.com/jp/en/about/governance/corporategovernance.html)

Social

Corporate Governance

Number of Independent Outside Directors/ Directors*





Number of women Directors/Directors*



^{*} Based on the status as of July 1, 2018

Matters Deliberated by the Board of Directors

In order to lead MC's sustainable growth and increase mid- and long-term corporate value, the Board of Directors deliberates on important management issues, such as management strategies, and supervises business execution by way of business execution reporting from each Section and Business Group. In addition, matters requiring a resolution by the Board of Directors in accordance with laws and regulations and the Articles of Incorporation are deliberated and resolved based not only on economic aspects, but also with an emphasis on ESG (Environment, Social, and Governance) perspectives. In particular, for investment and loan proposals, the Board of Directors sets out monetary threshold standards for each type of risk such as credit risk, market risk and business investment risk (amounts do not exceed 1% of total assets and are set individually depending on the nature of the risk) in accordance with MC's scale of assets and investments. Investments and loans that exceed this monetary threshold are deliberated and resolved by the Board of Directors.

Business execution other than these matters for resolution by the Board of Directors is entrusted to Executive Officers in accordance with the allocation of duties decided by the Board of Directors for prompt and efficient business execution. Business is executed through the President, as the Chief Executive Officer, and the Executive Committee (meets twice monthly), as a management decision-making body to take responsibility for business execution.

Further, the Board of Directors strives to construct an internal control system for increasing corporate value by conducting appropriate, valid and efficient business execution in conformity with laws, regulations and the Articles of Incorporation. Each year, the board checks on the implementation of the internal control system and makes ongoing improvements and enhancements.

Board of Directors' Advisory Bodies

Governance, Nomination and Compensation Committee

The Governance, Nomination and Compensation Committee has met around twice a year since its establishment in 2001. A majority of the members of the committee are Outside Directors, Outside Audit & Supervisory Board Members, and Outside Members. It conducts continuous reviews of corporate governance-related issues and discusses requirements for President & CEO and basic policies concerning its appointment and dismissal as well as

⟨Select Topics Discussed by the Governance, Nomination and Compensation Committee in the Fiscal Year Ended March 2018⟩

- <u>Revision of Rules and Operations for the Board of Directors</u> Discussed a proposal to revise rules and operations for the Board of Directors based on the evaluation results of the effectiveness of the Board of Directors
- <u>Revising System for the Appointment of Retired Executive to</u> Advisory Positions

Discussed a system for the appointment of CEOs and Chairmen to the Honorary Chairman and Senior Corporate Advisor positions upon retirement

 Policies for Selecting Directors and Audit & Supervisory Board <u>Members</u>

Discussed the requirements and candidate selection process for Directors and Audit & Supervisory Board Members

 <u>Remuneration System / operating Policy for the President's</u> <u>Performance Evaluation Committee</u> Discussed review of remuneration levels for Directors, Audit & Supervisory Board Members and Executive Officers, a proposed policy for payment of Company-wide performance-linked bonuses, an operating policy proposal for the President's performance evaluation, and other matters

President's Performance Evaluation Committee

The President's Performance Evaluation Committee has been established as a subcommittee to the Governance, Nomination and Compensation Committee, comprising the same Chairman selection of individual candidates. The committee also discusses matters regarding the basic policy for selecting Directors and Audit & Supervisory Board Members when nominating them and the selection of individual candidates and so forth. The committee also deliberates on the remuneration system for Executive Officers, including the policy for setting remuneration and appropriateness of remuneration levels, and monitors operation of this system.

$\langle Composition of the Committee (*Committee Chairman) (as of July 1, 2018) \rangle$

• Outside Members (5):

Akihiko Nishiyama (Outside Director), Toshiko Oka (Outside Director), Akitaka Saiki (Outside Director), Tsuneyoshi Tatsuoka (Outside Director), Tadashi Kunihiro (Outside Audit & Supervisory Board Member)

• In-house Members (3):

Ken Kobayashi* (Chairman of the Board), Takehiko Kakiuchi (President and CEO), Shuma Uchino (Senior Audit & Supervisory Board Member)

and Outside Members as the parent committee to deliberate the assessment on the President's performance.

Environmental

Social

Corporate Governance

International Advisory Committee

The International Advisory Committee has met annually since its establishment in 2001. The committee comprises experts with a wide range of backgrounds in government, finance, administration and academia. Members of the committee offer proposals and advice from an international standpoint according to MC's management and corporate strategies as it develops its business globally. Further, the committee reports on the political and economic conditions of various regions and exchanges opinions on these matters. The International Advisory Committee fulfills a highly crucial role in deepening discussions in meetings of the Board of Directors.

Total	11
Number of in-house committee members	3
Number of outside committee members (Outside Directors and Audit & Supervisory Board Members)	2
Number of outside committee member (overseas)	6

(Overseas Members) (As of July 1, 2018)

Member	Nationality	Title	Years served	Principal area of specialization and background
Ambassador Richard Armitage	U.S.A.	Former United States Deputy Secretary of State	2 years	Ambassador Armitage previously served as Special Emissary to Jordan and United States Deputy Secretary of State. He is widely experienced in foreign diplomacy, is a leading expert on Asia and Japan within the U.S. and is acknowledged as an authority on the Middle East.
Professor Joseph S. Nye	U.S.A.	Harvard University Distinguished Service Professor	10 years	Professor Nye is a globally renowned scholar in the field of geopolitics. He has extensive networks not only in academia, but also in political and economic circles. Within the International Advisory Committee, he provides an annual overview of the international situation and makes valuable suggestions regarding industry trends.
Mr. Ratan N. Tata	India	Chairman, Tata Trusts	18 years	Mr. Tata has expanded his business presence to over 100 countries worldwide and has particularly deep knowledge of industrial as well as political and economic developments in India.
Mr. George Yeo	Singapore	Chairman, Kerry Logistics Network	5 years	Mr. Yeo has previously served as Singapore's Minister for Information and the Arts, Minister for Health, Minister for Trade and Industry, and Minister for Foreign Affairs. His background brings a wealth of knowledge in the geo- political situation in ASEAN and China to the committee.
Mr. Niall FitzGerald, KBE	Ireland	Former CEO and Chairman, Unilever	5 years	Mr. FitzGerald, KBE has served as Chairman of several major companies such as Reuters and Unilever, as well as the British Museum. He has an outstanding knowledge of both geopolitics and industry, and his consideration of the impacts of geopolitical changes on business provides valuable advice for the International Advisory Committee.
Mr. Jaime Augusto Zobel de Ayala II	The Philippines	Chairman and CEO, Ayala Corporation	18 years	Mr. Zobel has experience in growing a global business launched from the ASEAN region, and therefore has a thorough knowledge of various geopolitical and industry trends in Asia, particularly in the ASEAN region.

(Japanese Members) (As of July 1, 2018)

^{Chairman of IAC} Ken Kobayashi	Takehiko Kakiuchi	Kanji Nishiura	Akitaka Saiki	Tsuneyoshi Tatsuoka
Chairman of the Board	President and CEO	Member of the Board,	Outside Director	Outside Director
		Executive Vice President		

IAC Agenda and Keynote Speakers for the Fiscal Year Ending March 31, 2019

Ambassador Armitage • Future of free trade

• Threats to global growth Professor Nye

Mr. FitzGerald, KBE • Potential of emerging markets

* Committee members carried out robust discussions regarding the various topics introduced by keynote speakers, with Group executives actively participating in sessions relevant to their businesses.

Audit & Supervisory Board Members /Audit & Supervisory Board

The Audit & Supervisory Board comprises all of the Audit & Supervisory Board Members responsible for auditing the decision-making processes and management performance of Directors according to the Companies Act and other laws and regulations, MC's Articles of Incorporation and internal rules and regulations. In-house Audit & Supervisory Board Members conduct audits based on many years of experience working within MC, while Outside Audit & Supervisory

Board Members conduct audits from a neutral and objective perspective based on extensive experience in their respective fields of expertise, to ensure that management is sound. In addition, the Audit & Supervisory Board passes resolutions on matters required by law and other important issues, and each Audit & Supervisory Board Member reports and shares information on the status of audit activities.

2016 Audit & Supervisory Board Member MC (present position)

Structure of the Audit & Supervisory Board (As of July 1, 2018)

Shuma Uchino	2018 Senior Audit & Supervisory Board Member (full-time) (present position) 1978 Joined MC	Ikuo Nishikawa*	2010 Addit & Supervisol's board Meinber, Mc (present position), 2012 Professor, Faculty of Business & Commerce of Keio University (resigned in March 2017), 2007 Chairman, Accounting Standards Board of Japan (resigned in March 2014), 1990 Representative Partner, KPMG Century Audit Corporation (currently Ernst & Young ShinNihon LLC) (resigned in July 2001), 1974 Joined EIKO Certified Public Tax Accountant's Corporation (currently Ernst & Young ShinNihon LLC)
Hiroshi Kizaki	2015 Audit & Supervisory Board Member (full-time) (present position) 1981 Joined MC	Yasuko Takayama*	2016 Audit & Supervisory Board Member, MC (present position) 2011 Audit & Supervisory Board Member, Shiseido Company, Limited (resigned in June 2015) 1980 Joined Shiseido Company, Limited
Tadashi Kunihiro*	2012 Audit & Supervisory Board Member, MC (present position) 1994 Established Kunihiro Law Office (Partner, Attorney-at-Law) (currently T. Kunihiro & Co., Attorneys-at-Law) (present position) 1986 Admitted to the Japan Bar (Attorney-at-Law)	Members as provided for in fulfillment of the condition Stock Exchange, Inc. and o	of the conditions for Outside Audit & Supervisory Board Article 2, Item 16 of the Companies Act. Also indicates the s for Independent Directors/Auditors as specified by Tokyo ther stock exchanges in Japan as well as selection criteria sory Board Members specified by MC.

Reference: Please refer to "Selection Criteria for Outside Directors and Outside Audit & Supervisory Members" on the MC website for thoughts regarding independence in selection criteria for Outside Directors.

(http://www.mitsubishicorp.com/jp/en/about/governance/corporategovernance.html)

Number of Independent Outside Audit & Supervisory Board Members/Number of Audit & Supervisory Board Members*



Number of Female Audit & Supervisory Board Members/Number of Audit & Supervisory Board Members*



* Based on the status as of July 1, 2018

Corporate Governance

Audit Plans

Every year, the Audit & Supervisory Board draws up an audit plan prior to the start of the audit year. The audit plan establishes important items for each year. In the fiscal year ended March 31, 2018, the Audit & Supervisory Board identified the following three important items and conducted various audit activities outlined in the Audit Implementation Guidelines described below.

Policies related to Midterm Corporate Strategy 2018	Monitoring the execution of initiatives discussed and confirmed by the Business Strategy Committee and at the Management Strategy Meeting and other forums
Group management	Monitoring the development and enhancement of systems that will reinforce Group management and crisis management and response capabilities at the consolidated level
Corporate governance	Monitoring the development of MC's governance system and internal control systems at MC Group companies

Audit Implementation Guidelines

The audit plan sets out five Audit Implementation Guidelines for the Audit & Supervisory Board Members to keep in mind when conducting audits. The Audit & Supervisory Board Members will conduct audit activities based on these guidelines, and proactively and constructively share insights and offer recommendations to ensure MC's sound, sustained growth and to contribute to establishing a corporate governance system that earns society's trust.

1. Implementation of systematic audits	All Audit & Supervisory Board Members cooperate closely with one another, in principle. The In-house Audit & Supervisory Board Members strive to gather information primarily by attending a wide range of key internal meetings, while the Outside Audit & Supervisory Board Members express impartial and objective opinions based on information they receive. The Outside Audit & Supervisory Board Members also proactively participate in various audit activities in an effort to monitor the status of management and business execution. (Please see "4. Audits of management performance") In order to ensure that systematic audits are performed effectively, MC has set up the Audit & Supervisory Board Members Office as an independent organization to assist the Audit & Supervisory Board Members. Five full-time staff members with backgrounds in corporate finance and accounting, as well as legal and compliance affairs, are ready to provide timely support.
2. Cooperation with the Independent Auditors	The Audit & Supervisory Board has strengthened cooperation with the Independent Auditors. Key measures include the Independent Auditors attending briefings on the outline of audit plans at the beginning of the year, quarterly reviews prepared by the Independent Auditors, and holding regular monthly meetings of the Audit & Supervisory Board Members and Independent Auditors. In another key measure, the Audit & Supervisory Board Members accompany the President and Group CEOs in dialogues with the Independent Auditors.
	missal and non-reappointment of the Independent Auditors are determined following a process at the fiscal year-end that nance. This process is based on data accumulated on the performance of the Independent Auditors during the fiscal year through ular meetings and other forums.
3. Cooperation with the Internal Audit Department	MC emphasizes cooperation between the Audit & Supervisory Board (Members) and Internal Audit Department. Every month, the In-house Audit & Supervisory Board Members hold regular meetings and exchange opinions with the General Managers of the Internal Audit Department and Legal Department. In these meetings, the General Manager of the Internal Audit Department explains the results of audits, while the General Manager of the Legal Department discusses litigation and compliance matters. Every quarter, the General Manager of the Internal Audit Department reports on audit results to the President in addition to the Audit & Supervisory Board.
4. Audits of management performance	The Audit & Supervisory Board Members strive to effectively monitor management performance through the audit activities described on the following page.

		In-house Audit & Supervisory Board Members	Outside Audit & Supervisory Board Members
Dialogue with Group CEOs and other members of senior management	The Audit & Supervisory Board Members conduct dialogues with all members of senior management, such as the Chairman, President, Corporate Functional Officers, Group CEOs, Division COOs, and General Manager of the Corporate Staff Section* ¹ . In addition, the Company has arranged a forum for dialogue between the Outside Audit & Supervisory Board Members and mid-level employees, in order to ensure an opportunity to gather information from the front lines. The Company also provides the opportunity for Outside Directors to participate in the dialogues with Group CEOs, Division COOs and others.	All members	Chairman President Corporate Functional Officers Group CEOs Division COOs
Attendance at important meetings	The Audit & Supervisory Board Members attend meetings of 20 important internal management structures such as the Board of Directors, Governance, Nomination and Compensation Committee, Executive Committee, Business Strategy Committee, and Management Strategy Meeting. Moreover, the staff of the Audit & Supervisory Board Members Office attend meetings held by all business groups to review Ioan and investment proposals, and report matters discussed to the Audit & Supervisory Board Members. Based on this, the Audit & Supervisory Board Members discuss Ioan and investment proposals prior to deliberation at the relevant Board of Directors meetings.	All members	Board of Directors Governance, Nomination and Compensation Committee*2
On-site audits and tours	Through on-site audits and tours, the Audit & Supervisory Board Members meet with the CEOs of 54 overseas and 16 domestic MC Group companies, as well as the regional chiefs of all 59 overseas and 5 domestic sites. The Audit & Supervisory Board Members report on the results of their on-site audits to the Chairman and the President.	All members	Includes participation in several on-site audits and tours ^{*3}
Training	MC has appointed one lawyer as an advisory member of the Audit & Supervisory Board, and has held three regular meetings with the lawyer. The Audit & Supervisory Board has received helpful recommendations from the lawyer, and has put these recommendations to good use in its audit activities. In addition, the Audit & Supervisory Board has conducted training through programs such as seminars offered by the Japan Audit & Supervisory Board Members Association and the Japan Foundation for Accounting Education and Learning.	All members	All members

*1 Dialogue was held 66 times in total in the fiscal year ended March 31, 2018.

*2 Attended by Audit & Supervisory Board Member Tadashi Kunihiro.

*3 Dialogues were held with regional chiefs of 15 overseas sites and CEOs of 1 domestic and 13 overseas MC Group companies during on-site audits and tours in the fiscal year ended March 31, 2018.

5. Operational audits of Group companies	Every quarter, the Audit & Supervisory Board conducts information sharing meetings with the Audit & Supervisory Board Members of 37 major MC Group companies, particularly large companies, in addition to holding dialogues with the CEOs of those companies. At these meetings, the Audit & Supervisory Board Members strive to share information on audit activities and develop a common understanding of MC's management policies. These activities are designed to gauge the development and status of internal control systems throughout the organization.
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Raising the Bar for Audits by Audit & Supervisory Board Members

In order for In-house and Outside Audit & Supervisory Board Members to fulfill their responsibilities, I believe that we must monitor the broadest possible range of daily business operations undertaken by executives. We are taking steps to accurately understand the larger picture behind businesses and the main purpose of various strategies. To this end, we are making a conscious effort to establish points of contact particularly between Outside Audit & Supervisory Board Members and MC's officers and employees. At the same time, we are enhancing the monitoring of management by encouraging greater information sharing and stronger cooperation between In-house and Outside Audit & Supervisory Board Members. Looking ahead, we seek to provide even more opportunities to foster effective communication and cooperation.

Senior Audit & Supervisory Board Member Shuma Uchino

Corporate Governance

Outside Directors and Outside Audit & Supervisory Board Members

Outside Directors and Outside Audit & Supervisory Board Members are as follows (as of July 1, 2018).

Outside Director

		t Main career	Principal area of specialization and background				Status of membership on advisory bodies to the Board of Directors		
Name (Age)	Independen Director		Corporate	Global developments	Socio-economic trends	Board of Directors	Governance, Nomination and Compensation Committee	International Advisory Committee	Years served - as
(Age)	Director		management			Attendance in fiscal year ended March 31, 2018	Attendance in fiscal March 31, 2		Director
	•	Professor, Ritsumeikan University				14/14 meetings	●(3/3 meetings)	_	3 years
		Supplementary information conc	erning applie	cable items		Rea (Includi	ason for appointment a ing reason for designation a	s Outside Direct as Independent Di	tor rector)
Akihiko Nishiyama (65)	Not applic	:able				management objective and relating to cor at universities, Mr. Nishiyama forth in Guid specified by th	a has been offering advic and properly oversees ex- professional perspective b rporate management and , and many years of experi a meets the requirements delines concerning Listed to Tokyo Stock Exchange, li ell as in Selection Criteria Corporation.	xecution of busin based on his resea human resource of ience in the busing s of independent d Company Com Inc. and other stoc	ess from an irch activities development ess. director set pliance, etc. ck exchanges
	٠	Chairman of the Board, Mitsubishi Heavy Industries, Ltd.				12/14 meetings ^{*1}	_	_	2 years
		Supplementary information conc	erning applie	cable items		Reason for appointment as Outside Director (Including reason for designation as Independent Director)			
Hideaki Omiya (71)						execution of busin sive insight develo hat conducts busi ident and CEO. independent direct any Compliance, e ther stock exchang	ness from a oped through iness around ctor set forth etc. specified ges in Japan,		

			Principal	area of specializ background	ation and		Status of membership o to the Board of			
Name	Independent	Main career	6			 Board of Directors 	Governance, Nomination and Compensation Committee	International Advisory Committee	– Years served – as	
(Age)	Director		Corporate management	Global developments	Socio-economic trends	Attendance in fiscal year ended March 31, 2018	Attendance in fisca March 31, 3		Director	
	•	CEO, Oka & Company Ltd. Business consultant				14/14 meetings	(3/3 meetings)	_	2 years	
		Supplementary information conce	erning applic	cable items			ason for appointment a ng reason for designation			
Toshiko Oka (54)	Ms. Oka served as Principal, Deloitte Tohmatsu Consulting Co., Ltd. (currently ABeam Consulting Ltd.) until August 2012. Although Mitsubishi Corporation has business transactions with that company, it has been about 6 years since her resignation. Therefore, there is no relationship between her and those transactions. Also, Ms. Oka served as Partner, PwC Advisory LLC from April 2016 to June 2016. Although Mitsubishi Corporation currently has business transactions with that company, it has been about 2 years since her resignation. Therefore, there is no relationship between her and those transactions. In addition, Mitsubishi Corporation has had no business transaction for the past three fiscal years with PricewaterhouseCoopers Deals Advisory LLC, where Ms. Oka has been served prior to the merger between PricewaterhouseCoopers Deals Advisory LLC and PwC Advisory LLC in April 2016. As above, Ms. Oka meets the requirements concerning independence set forth in the Selection Criteria for Outside Directors specified by Mitsubishi Corporation. Therefore, Mitsubishi Corporation judges her independence is assured.					and properly oversees of diversified perspective le the consulting industry an ipanies. is the requirements of im- neerning Listed Company is Exchange, Inc. and othe	execution of busi based on her ma d experience as ou dependent directo v Compliance, etc. er stock exchanges	ness from a any years of tside director r set forth in specified by s in Japan, as		
	٠	Former Vice-Minister for Foreign Affairs, Ministry of Foreign Affairs of Japan				10/10 meetings ^{*2}	(3/3 meetings)	(1/1 meeting)	1 year	
	Supplementary information concerning applicable items						Reason for appointment as Outside Director (Including reason for designation as Independent Director)			
Akitaka Saiki (65)	 Mr. Saiki received compensation as Corporate Advisor of Mitsubishi Corporation from September 2016 to June 2017, having been appointed as a member of an advisory body to the Board of Directors (Governance, Nomination and Compensation Committee); however, this compensation was paid as consideration for the advice he offered regarding the management of Mitsubishi Corporation based on his experience and insight, and does not affect his independence. Also, Mr. Saiki serves as the President of the Middle East Institute of Japan, Juridical Foundation (part-time position), which conducts studies and research concerning the Middle East region. Mitsubishi Corporation pays membership fees and other dues of approximately ¥4.70 million per annum to the Middle East Institute of Japan. However, these payments are consistent with Mitsubishi Corporation's support for the principles of the Middle East Institute of Japan; therefore, he does not benefit personally. As above, Mr. Saiki meets the requirements concerning independence set forth in the Selection Criteria for Outside Directors specified by Mitsubishi Corporation. Therefore, Mitsubishi Corporation judges his independence is assured. 					usiness from international ns developed e Ministry of r set forth in specified by s in Japan, as				
	•	Former Vice-Minister of Economy, Trade and Industry, Ministry of Economy, Trade and Industry				_	(2/2 meetings*3)	• -	Appointed in June 2018	
		Supplementary information conce	Rea (Includi	ason for appointment a ng reason for designation	as Outside Direc as Independent Di	tor rector)				
Tsuneyoshi Tatsuoka (60)	Mr. Tatsuoka received compensation as Corporate Advisor of Mitsubishi Corporation from January 2018 to June 2018, having been appointed as a member of an advisory body to the Board of Directors (Governance, Nomination and Compensation Committee); however, this compensation was paid as consideration for the advice he offered regarding the management of Mitsubishi Corporation based on his experience and insight, and does not affect his independence. Furthermore, Mr. Tatsuoka's advisor contract finished with his election as a Director at the 2018 Ordinary General Meeting of Shareholders. As above, Mr. Tatsuoka meets the requirements concerning independence set forth in the Selection Criteria for Outside Directors specified by Mitsubishi Corporation. Therefore, Mitsubishi Corporation judges his independence is assured.					management objective and regarding dom the Ministry of Mr. Tatsuoka n in Guidelines of the Tokyo Stoc	has been offering advic and properly oversees e professional perspective estic and global economic international Trade and I neets the requirements of concerning Listed Compar & Exchange, Inc. and othe ction Criteria for Outside I	execution of busin based on his exter trends, having hel ndustry and other. f independent dire ny Compliance, etce er stock exchanges	tess from an ensive insight d key posts at ctor set forth . specified by s in Japan, as	

*1 Mr. Omiya was asked to refrain from attending one of the Board of Directors meetings because of conflict of interest in connection with tender offer for shares in Mitsubishi Motors Corporation.
 *2 Describes status since appointment as a Director on or after June 23, 2017.

*3 Describes status since appointment (then advisor) to the Governance, Nomination and Compensation Committee on or after January 1, 2018.

Outside Audit & Supervisory Board Members

	Independent		Principal area of specialization and background			Attendance	in fiscal year	Status of memb advisory bodies to Director	the Board of	– Years served
Name (Age)	Audit & Supervisory Board		Socio- economic		Finance and		ch 31, 2018	Governance, Nomination and Compensation Committee	International Advisory Committee	as Audit & Supervisory Board
	Member		trends	affairs	accounting	Board of Directors	Audit & Supervisory Board	Attendance in fisca March 31, 2		Member
	٠	Attorney at T. Kunihiro & Co., Attorneys-at-Law				14/14 meetings	13/13 meetings	(3/3 meetings)	_	6 years
		Supplementary information con	cerning app	licable item	S			as Outside Audit & Sution as Independent Audit		
Tadashi Kunihiro (62)	Not applicable					extensive in: Act and the developed th Mr. Kunihiro Guidelines o Tokyo Stock Selection Cri	sight regardin Financial Inst trough many y meets the r concerning Lis Exchange, Inc	ducting neutral and of g corporate-related law truments and Exchang years of experience as a requirements of indepe sted Company Complia and other stock excha ide Audit & Supervisor	ws (such as the e Act of Japan attorney. endent auditor ance, etc. spec anges in Japan,	e Companie) which wa set forth i ified by th as well as i
	•	Former Professor, Faculty of Business & Commerce of Keio University Certified Public Accountant				14/14 meetings	13/13 meetings	_	_	2 years
Ikuo		Supplementary information con	cerning app	licable item	S			as Outside Audit &Sution as Independent Audit		
Nishikawa (67)	Mr. Nishikawa worked as Professor, Facul University until March 2017. Mitsubishi Con		oration contr or Keio Unive ucts field wor ion and medi nts concernin pervisory Boa	ibuted ¥30,00 ersity School o rk investigatio cal research ir g independer ard Members	00 per year of Medicine, ons or other a developing ace set forth specified by	his extensive experience a Mr. Nishikav Guidelines c Tokyo Stock Selection Cri	e insight regar is a certified p va meets the concerning Lis Exchange, Inc	conducting neutral and ding accounting develo ublic accountant. requirements of indep sted Company Complia and other stock excha ide Audit & Supervisor	oped through m rendent auditor ance, etc. spec anges in Japan,	any years o set forth i ified by th as well as i
	٠	Former Audit & Supervisory Board Member, Shiseido Company, Limited				14/14 meetings	13/13 meetings	_	_	2 years
		Supplementary information con	cerning app	licable item	s			as Outside Audit &Su tion as Independent Audit		
Yasuko Takayama (60)	Ms. Takayama worked as an executive at Shiseido Company, Limited until June 2011. Mitsubishi Corporation currently has business transactions with that company, though these transactions are ¥1.8 million per year. In addition, it has been about 7 years since Ms. Takayama left her position as a direct employee, therefore, there is no relationship between her and those transactions. As above, Ms. Takayama meets the requirements concerning independence set forth in the Selection Criteria for Outside Audit & Supervisory Board Members specified by Mitsubishi Corporation. Therefore, Mitsubishi Corporation judges her independence is assured.					Ms. Takayan her experien Limited, and Ms. Takayan Guidelines c Tokyo Stock Selection Cri	ha has been o the as Audit & as outside din ha meets the concerning Lis Exchange, Inc	conducting neutral and Supervisory Board Me rector at various compa requirements of indep sted Company Complia and other stock excha ide Audit & Supervisor	l objective aud mber at Shiseio nies. rendent auditor ance, etc. spec anges in Japan,	its based or to Company set forth in ified by the as well as in

Selection Criteria for Outside Directors and Outside Audit & Supervisory Board Members

To make the function of Outside Directors and Outside Audit & Supervisory Board Members stronger and more transparent, Mitsubishi Corporation has set forth Selection Criteria for Outside Directors and Outside Audit & Supervisory Board Members as follows, after deliberation by the Governance, Nomination and Compensation Committee, which is composed of a majority of Outside Directors, Outside Audit & Supervisory Board Members and Outside Members. Each of the 5 Outside Directors and 3 Outside Audit & Supervisory Board Members satisfy the requirements for independent Directors and Audit & Supervisory Board Members as stipulated by Japanese stock exchanges, such as the Tokyo Stock Exchange, and Mitsubishi Corporation's Selection Criteria for Outside Directors and Outside Audit & Supervisory Board Members.

[Selection Criteria for Outside Directors]

- Outside Directors are elected from among those individuals who have an eye for practicality founded on a wealth of experience as corporate Executive Officers, as well as an objective and specialist viewpoint based on extensive insight regarding global conditions and social and economic trends. Through their diverse perspectives, Outside Directors help ensure levels of decision-making and management oversight appropriate to the Board of Directors.
- 2. To enable Outside Directors to fulfill their appointed task, attention is given to maintain their independence (Note); individuals incapable of preserving this independence in effect will not be selected to serve as Outside Directors.
- 3. Mitsubishi Corporation's operations span a broad range of business domains; hence there may be cases of conflict of interest stemming from business relationships with firms home to a corporate Executive Officer appointed as Outside Directors. Mitsubishi Corporation appropriately copes with this potential issue through the procedural exclusion of the director in question from matters related to the conflict of interest, and by preserving a variety of viewpoints through the selection of numerous Outside Directors.

[Selection Criteria for Outside Audit & Supervisory Board Members]

- Outside Audit & Supervisory Board Members are selected from among individuals who possess a wealth of knowledge and experience across various fields that is helpful in performing audits. Neutral and objective auditing, in turn, will ensure sound management.
- 2. To enable Outside Audit & Supervisory Board Members to fulfill their appointed task, attention is given to maintain their independence (Note); individuals incapable of preserving this independence will not be selected to serve as Outside Audit & Supervisory Board Members

[(Note) Independence for the purpose of Selection Criteria for Outside Directors and Outside Audit & Supervisory Board Members] To make a judgment of independence, Mitsubishi Corporation checks if the person concerned meets the conditions for independent Directors and independent Audit & Supervisory Board Members as specified by stock exchanges in Japan such as the Tokyo Stock Exchange, Inc., and whether the person concerned is currently any of the following items (1) to (7) and whether they have been at any time in the past 3 fiscal years.

- (1) A major shareholder of Mitsubishi Corporation (a person or entity directly or indirectly holding 10% or more of the voting rights), or a member of business personnel of such shareholder*1.
- (2) A member of business personnel of a creditor of Mitsubishi Corporation exceeding the threshold set by Mitsubishi Corporation*².
- (3) A member of business personnel of a supplier or a customer of Mitsubishi Corporation exceeding the threshold set by Mitsubishi Corporation*³.
- (4) A provider of professional services, such as a consultant, lawyer, or certified public accountant, receiving cash or other financial benefits from Mitsubishi Corporation, other than directors' or Audit & Supervisory Board Members' remuneration, where the amount exceeds ¥10 million per fiscal year.
- (5) A representative or partner of Mitsubishi Corporation's independent auditor.
- (6) A person belonging to an organization that has received donations exceeding a certain amount*⁴ from Mitsubishi Corporation.
- (7) A person who has been appointed as an Outside Director or Outside Audit & Supervisory Board Member of Mitsubishi Corporation for more than 8 years.
- *1 A member of business personnel refers to a managing director, corporate officer, Executive Officer, or other employee of a company.
- *2 Creditors exceeding the threshold set by Mitsubishi Corporation refer to creditors to whom Mitsubishi Corporation owes an amount exceeding 2% of Mitsubishi Corporation's consolidated total assets.
- *3 Suppliers or customers exceeding the threshold set by Mitsubishi Corporation refer to suppliers or customers whose transactions with Mitsubishi Corporation exceed 2% of Mitsubishi Corporation's consolidated revenues.
- *4 Donations exceeding a certain amount refer to donations of more than ¥20 million per fiscal year.

If a person is still judged to be effectively independent despite one or more of the above items (1) to (7) applying, Mitsubishi Corporation will explain and disclose the reason at the time of their appointment as an Outside Director or Outside Audit & Supervisory Board Members.

Enhancing the Monitoring Function of the Board of Directors

To ensure that the Directors and Audit & Supervisory Board Members are able to perform their management supervision and audit functions adequately, the Board of Directors Office and the Audit & Supervisory Board Members Office have been established, and have been providing necessary information and support appropriately and in a timely manner for them to perform their duties.

For Outside Directors and Outside Audit & Supervisory Board Members, the offices provide Board of Directors meeting materials and explanations as well as hold briefing sessions about management strategies, important matters, and other topics before Board of Directors meetings to ensure that they can effectively participate in the discussion fully and to enhance the Board's monitoring function. The offices also provide an orientation to newly appointed Outside Directors and Outside Audit & Supervisory Board Members, as well as ongoing opportunities to deepen their understanding of the businesses and strategies of MC including site visits of business investees and opportunities for dialogue with the management

Enhance Provision of Information

Prior to each Board of Directors meeting, the meeting materials are distributed and the management executives of the Corporate Staff Section and Business Groups spend approximately three hours on average providing a briefing session regarding their business status, investments and loans, and corporate projects to the Outside Directors and Outside Audit & Supervisory Board Members, covering the strategic importance and key points of management strategies. Moreover, for investments and loans deliberated in the Board of Directors

Site Visits to Business Investees

For further understanding of MC and MC Group's wide range of business lines, every year Outside Directors and Outside Audit & Supervisory Board Members participate in site visits to MC Group companies and other sites, and hold dialogues with the management of Group companies and others.

In August 2018, MC held site visits to its wholly owned subsidiary, Cermaq Group AS^{*1} in Norway, where the participants observed the salmon farming business and had a lively exchange of opinion with the subsidiary's management executives, and visit ed an offshore wind farm facility in the North Sea.

In April 2018, MC organized site visits to its large mixed-use redevelopment project in Yangon the Mandalay International Airport operation business, and other activities in Myanmar, and executives. Furthermore, to enhance the effectiveness of the Board of Directors, MC holds meetings of the Governance, Nomination and Compensation Committee and the President's Performance Evaluation Committee, which comprise a majority of Outside Directors and Outside Audit & Supervisory Board Members in their memberships. Also, MC endeavors to enhance close cooperation among Outside Directors and Outside Audit & Supervisory Board Members through such measures as holding exclusive meetings of Independent Outside Directors and Outside Audit & Supervisory Board Members approximately once every guarter to provide opportunities for discussion about a wide range of themes such as business management and the corporate governance of MC. To further enhance the effectiveness of the management supervision function, MC also holds informal meetings of the Board of Directors whenever necessary to provide a forum for free discussion among Directors and Audit & Supervisory Board Members.

meetings, an overview of the deliberation and key points by the Executive Committee, the management decision-making body on the executive side, is shared beforehand to report the discussion process on the executive side with the Outside Directors and Outside Audit & Supervisory Board Members. Furthermore, MC organizes dialogues with the MC management executives to provide an opportunity for Outside Directors & Outside Audit & Supervisory Board Member to hear opinions directly from the executive side.

visited partner companies to engage in dialogues.

In September 2017, MC hosted site visits in Australia which included MDP's^{*2} coking coal assets. Besides touring BMA-owned Peak Downs coal mine and Hay Point coal terminal, participants actively engaged in discussions with the top management of our Australian Group companies.

^{*1} Cermaq Group AS is the third largest salmon farming, processing and sales company in the world with operations in Norway, Chile and Canada. It produces about 190 thousand metric tons of salmon per year. Cermaq became a wholly owned subsidiary of MC in October 2014, and supplies sustainable, safe and secure farmed salmon worldwide.

^{*2} MDP stands for Mitsubishi Development Pty Ltd. In 2001, BMA was established as a 50-50 joint venture between MDP and mineral resources major BHP. BMA is one of the world's largest seaborne coking coal suppliers. It owns seven operating coal mines with additional undeveloped reserves, in addition to a coal terminal in Queensland, Australia.

Corporate Governance

Meetings of Independent Outside Directors and Outside Audit & Supervisory Board Members (Approximately Once Every Quarter)

MC endeavors to enhance close cooperation among Independent Outside Directors and Outside Audit & Supervisory Board Members by providing opportunities for free discussion about a wide range of themes relating to MC's business management and corporate governance.

In the fiscal year ended March 31, 2018, MC held meetings for exchanging opinions on themes such as sustainability, social contribution and dialogue with shareholders. In the fiscal year ending March

Interaction with Management Executives

To enable Outside Directors and Outside Audit & Supervisory Board Members to understand candidates for Executive Officer, opportunities are regularly provided for the Outside Directors and Outside Audit & Supervisory Board Members to engage in dialogue with management executives of MC and the MC Group outside of the Board of Directors. 31, 2019, MC invited institutional investors to engage in dialogue regarding recent interests and trends of institutional investors. Furthermore, before the conception of Midterm Corporate Strategy 2021, the President & CEO explained the policy and approach of its conception and exchanged opinions with Outside Directors and Outside Audit & Supervisory Board Members.

Moreover, as noted in the section of "Enhance Provision of Information" on page 50, holding briefing sessions for the Board of Directors meetings at which the management executives helps Outside Directors and Outside Audit & Supervisory Board Members exchange their ideas, concerns and philosophy with management executives.

Evaluation of the Effectiveness of the Board of Directors

MC undertakes an evaluation of the Board of Directors every year in order to continually enhance the effectiveness of corporate governance. The evaluation of the fiscal year ended March 31, 2017 was undertaken by a third party. For the evaluation of the fiscal year ended March 31, 2018, MC adopted a self-evaluation process in line with the evaluation theme of "further enhancing the functions of the Board of Directors." Director Akihiko Nishiyama and Audit & Supervisory Board Member Yasuko Takayama, who serve as Independent Outside Director and Independent Outside Audit & Supervisory Board Member, respectively, took the lead in formulating questions and analyzing and evaluating the results.

1. The process and themes of the evaluation of the Board of Directors for the fiscal year ended March 2018 were deliberated in the Governance, Nomination and
Compensation Committee.
2. Questionnaires and interviews involving all Directors and Audit & Supervisory Board Members were conducted.
3. The results of the interviews were compiled and deliberated together with future policies in the Governance, Nomination and Compensation Committee.
4. Based on the result of discussions in the Governance, Nomination and Compensation Committee, the Board of Directors analyzed and evaluated the findings and shared future policies.
The questions concerned the evaluation of measures undertaken in the fiscal year ended March 2018, the composition, structure, operation, oversight and audit functions of the Board of Directors, the status of individual involvement, and further enhancement of the functions of the Board of Directors, among other matters.
MC's hybrid model of corporate governance based on the Audit & Supervisory Board Member System has been functioning effectively as a governance system. Adequate information has been provided to Outside Directors and Outside Audit & Supervisory Board Members. There has also been sufficient communication among Outside Directors and Outside Audit & Supervisory Board Members, as well as communication with personnel involved in business execution.
The Board of Directors was evaluated to be appropriate in terms of composition, operation, deliberation and other aspects. The Board of Directors has adequate systems for the exercise of decision-making and oversight functions and these functions are being realized appropriately. Moreover, the Audit & Supervisory Board Members have been fulfilling their roles in meetings of the Board of Directors based on self-evaluations by the Audit & Supervisory Board Members.
The evaluation highly commended measures implemented in the fiscal year ended March 2018 (observation tours of business investees, etc.) as a result of the findings of the Board of Directors evaluation undertaken in the fiscal year ended March 2017. Meanwhile, the evaluation identified the need to continue upgrading and expanding deliberation on strategies and other important matters.
The evaluation proposed a number measures to be undertaken going forward. From the standpoint of further enhancing the functions of the Board of Directors, a matter was discussed throughout the fiscal year ended March 2018, which included measures such as upgrading and enhancing Companywide and Group strategies and the monitoring of major business investees, revising agenda items, and enhancing and expanding feedback and follow-up activities to enhance discussions. Other measures included enhancing communication in forums other than the Board of Directors meetings, and considering ways to involve the Outside Directors and Outside Audit & Supervisory Board Members in the successor planning and selection process.

Based on the analysis and evaluations of the Governance, Nomination and Compensation Committee and the Board of Directors with respect to the issues highlighted by the evaluation results and the opinions and recommendations from Directors and Audit & Supervisory Board Members, MC will implement measures to further enhance the effectiveness of the Board of Directors.

Governance Reforms at Mitsubishi Corporation — Building a More Effective Board of Directors—

"What is the vision for corporate governance at Mitsubishi Corporation?" In response to this question raised by Outside Directors and Outside Audit & Supervisory Board Members, In-house Directors and In-house Audit & Supervisory Board Member came together with them to have many discussions. The discussions led to a sweeping reform of rules and operating processes of the Board of Directors. We will continue to implement reforms through evaluations of the effectiveness of the Board of Directors and other means.

April 2017 Launch of the Board of Directors' Informal Meeting	"Would like to propose that we hold the Board of Directors' informal meeting whenever necessary to provide a forum for free discussion among Directors and Audit & Supervisory Board Members to further enhance intensive communication and build an even more effective Board of Directors."
May 2017 Issues Raised by Outside Directors and Outside Audit & Supervisory Board Members	At the first informal meeting of the Board of Directors, the main topic of discussion was the role of the Board of Directors. Outside Directors and Outside Audit & Supervisory Board Members raised the following issues.
October 2017 Mapping Out Reforms	The Governance & Compensation Committee, an advisory body to the Board of Directors and comprised of a majority of Outside Directors, Outside Audit & Supervisory Board Members and Outside Members, confirmed the following key direction for this reform: (1) focus on company-wide strategy and other important matters by narrowing down agenda items and (2) enhance monitoring function of Corporate Staff Section and Business Groups and business investees.
January to March 2018 Identify Specific Issues	In line with the evaluation theme of "further enhancing the function of the board," MC conducted an evaluation of the effectiveness of the board led by Independent Outside Directors and Outside Audit & Supervisory Board Members. Through questionnaires and interviews, issues pertaining to the Board of Directors were highlighted.
March 2018 Discuss Specific Solutions	The Governance & Compensation Committee discussed solutions to the issues raised by Directors and Audit & Supervisory Board Members and confirmed the highlights of the governance reforms which were took forward.
April 2018 Deliberations and Resolutions by the Board of Directors	Based on the discussions held to date, the Board of Directors deliberated matters in its regular meeting in April 2018, and from May the new rules and operating processes for the Board of Directors were set in motion. (See below of the main points of the reforms).
•	

Review of reforms (evaluation of the effectiveness of the board)

Highlights of reforms to the Board of Directors

- 1) Monitoring enhancements
- Business execution reporting by the Corporate Staff Section and Business Groups in board meetings was expanded. Strategies and governance of major business investees of each business group were also discussed in line with the advancement of consolidated management.
- 2) Revisions to rules for the Board of Directors
- The current level of monetary threshold standards for investments and loans of MC and the MC Group were, in principle, doubled and more decisionmaking authority was delegated to the executive side in order to facilitate further board focus on deliberation for management strategy and important matters.

- 3) Enhancements and streamline improvements to the operating processes of the Board of Directors by expanding briefing sessions for board members and others
- With regard to matters such as management strategies and business execution reporting of the Corporate Staff Section and Business Groups, management executives from that Section and Groups will provide briefing sessions on the strategic significance and key points.

Directors' and Audit & Supervisory Board Members' Remuneration

In line with the Basic Policy on Corporate Governance, MC has established a remuneration system for Directors and Audit & Supervisory Board Members and related systems to ensure a sustainable increase in corporate value, and to ensure that their respective roles are fulfilled properly according to business execution and management supervision functions. MC strives to operate the system with a high degree of transparency. Within this system, the policy for setting remuneration, appropriateness of remuneration levels, and operation of the remuneration system for Directors responsible for business execution are discussed and monitored by the Governance, Nomination and Compensation Committee.

The details and methods for setting remuneration for Directors and Audit & Supervisory Board Members are as follows:

Directors/Audit & Supervisory Board Members	Type of Director or Audit & Supervisory Board Member (As of July 1, 2018)	Approach to Remuneration	Method for Setting Remuneration			
Directors	Directors responsible for business execution (who also serve as Executive Officers) (7)	 The remuneration of Directors who also serve as Executive Officers and are responsible for business execution are set with the aim of providing further incentive and motivation to achieve business results and creation of sustainable business value through the steady execution of the midterm corporate strategy, along with aligning the Directors' interests with those of the shareholders over the medium and long terms. The remuneration of Directors responsible for business execution consists of fixed and variable remuneration. MC has adopted variable remuneration including not only cash remuneration linked to consolidated business results and individual performance but also stock remuneration (stock-option-based remuneration) to provide further incentive to improve corporate value over the medium and long terms. 	 Regarding remuneration for the Chairman of the Board, Outside Directors, and Directors responsible for busi- ness execution (excluding bonuses), the 2010 Ordinary General Meeting of Shareholders approved a payment limit of ¥1.6 billion per annum. Remuneration is paid within this remuneration limit subject to resolution of the Board of Directors. Meanwhile, bonuses for Directors responsible for busi- ness execution are subject to approval by the Ordinary General Meeting of Shareholders, given their strong linkage to MC's business results. 			
	Chairman of the Board (1)	• The Chairman of the Board and the Outside Directors,				
	Outside Directors (5)	who do not also serve as Executive Officers, must pri-				
Audit & Supervisory Board Members	In-house Audit & Supervisory Board Members (2) Outside Audit & Supervisory Board Members (3)	marily fulfill a supervisory function for management in an appropriate manner, while the Audit & Supervisory Board Members must perform audits appropriately. Accordingly, there is a need to ensure their indepen- dence. For this reason, they are paid only fixed monthly remuneration, which does not have a component linked with business results.	• The monthly remuneration of Audit & Supervisory Board Members was set at an upper limit of ¥15 million per month in total by resolution of the 2007 Ordinary General Meeting of Shareholders. Audit & Supervisory Board Members' base remuneration is paid within this remuneration limit subject to discussions by the Audit & Supervisory Board Members.			

Total Amounts and Number of Eligible People in the Fiscal Year Ended March 2018

Total remuneration amounts for Directors and Audit & Supervisory Board Members and numbers of eligible people are as follows.

									(Millions of ye
Title	Total Remuneration	Base Remuneration and Individual Performance Bonus		Bonus		Stock-option-based Remuneration		Reserved Retirement Remuneration	
		Eligible Persons	Total	Eligible Persons	Total	Eligible Persons	Total	Eligible Persons	Total
Directors (In-house)	1,198	9	667	6	270	7	188	7	73
Directors (Outside)	120	6	120	_	—	—	—	_	—
Title	Total	Base Remur	neration	Bonu	5	Stock-option Remuner		Reserved Ret Remunera	
intic	Remuneration	Eligible Persons	Total	Eligible Persons	Total	Eligible Persons	Total	Eligible Persons	Total
Audit & Supervisory Board Members (In-house)	136	2	136	_	_	_	_	_	_
Audit & Supervisory Board Members (Outside)	39	3	39	_	_	_	_	_	_

(Figures less than one million yen are rounded down)

Notes: 1. The above figures include 2 Directors who retired and 1 Director who resigned during the fiscal year ended March 2018.

As of March 31, 2018, there were 12 Directors (including 5 Outside Directors) and 5 Audit & Supervisory Board Members (including 3 Outside Audit & Supervisory Board Members). 2. The stock-option-based remuneration above shows the amount recognized as an expense in the fiscal year ended March 31, 2018 related to stock options granted to 7 In-house Directors (Chairman of the Board and Outside Directors are ineligible for payment).

3. In addition to the above, MC paid executive pensions to retired Directors and Audit & Supervisory Board Members. The amounts paid in the fiscal year ended March 31, 2018 were as follows: The retirement bonus system, including executive pensions for Directors and Audit & Supervisory Board Members, was abolished at the close of the 2007 Ordinary General Meeting of Shareholders.

MC paid ¥146 million to 85 Directors (Outside Directors were ineligible for payment).

MC paid ¥6 million to 7 Audit & Supervisory Board Members (Outside Audit & Supervisory Board Members were ineligible for payment).

Names, Titles, Total Amounts of Consolidated Remuneration and Amount by Type of Remuneration for Each Director and Audit & Supervisory Board Member

Remuneration amounts for Directors and Audit & Supervisory Board Members whose total remuneration was ¥100 million or more are shown in the table below.

	Position	Total consolidated remuneration (Millions of yen)	Bonus (Millions of yen)				
Name			Base remuneration and individual performance bonus	Bonus	Stock options*1	Reserved retirement remuneration* ²	
Ken Kobayashi	Director	208	208	0	0	0	
Takehiko Kakiuchi	Director	342	157	91	64	28	
Eiichi Tanabe	Director	162	71	47	31	12	
Kazuyuki Masu	Director	119	57	31	22	8	
Iwao Toide	Director	100	45	31	16	6	
Akira Murakoshi	Director	100	45	31	16	6	
Masakazu Sakakida	Director	100	45	31	16	6	

(Figures less than one million yen have been rounded down)

*1 The amount of stock options is the amount recorded as an expense in the accounting treatment for that fiscal year and differs from the actual amount received from the exercise or sale of stock options. Moreover, under the conditions for exercise of stock acquisition rights, the starting date of the exercise period for stock acquisition rights had not arrived as of March 31, 2017.

*2 The amount of reserved retirement remuneration is accumulated each year as a fixed amount of remuneration for the exercise of duties by each Director over one year. It is paid to the Director after his or her retirement. The amount of stock options is the amount recorded as an expense in the accounting treatment for that fiscal year and differs from the actual amount received from the exercise or sale of stock options. Moreover, under the conditions for exercise of stock acquisition rights, the starting date of the exercise period for stock acquisition rights had not arrived as of March 31, 2017.

*3 None of the above Directors receive remuneration as a Director or an Audit & Supervisory Board Member of a consolidated subsidiary.

*4 Members of the Board Kanji Nishiura and Mitsumasa Icho assumed their positions as Members of the Board as of June 22, 2018, and therefore did not receive base remuneration (as part of Remuneration of Directors) for the fiscal year ended March 31, 2018.

Significant Employee Salaries of Directors and Audit & Supervisory Board Members Serving Concurrently as Employees

None of MC's Directors and Audit & Supervisory Board Members serve concurrently as employees.
Composition of the Remuneration of Directors Responsible for Business Execution

Remuneration type	Remuneration composition	Fixed/ Variable*1	Form of payment	Included within remuneration limit*2	
Base Remuneration	An amount determined according to position, paid monthly	Fixed	Cash	0	
Individual Performance Bonus	For Directors responsible for business execution, individual performance bonuses are determined and paid on an individual basis after the President's yearly performance assessment of each Director for the previous fiscal year. The assessment on the President's performance is deliberated by the President's Performance Evaluation Committee, a subcommittee to the Governance, Nomination and Compensation Committee. The subcommittee comprises the Chairman, who also serves as the Chairman of the Governance, Nomination and Compensation Committee Directors and Outside Audit & Supervisory Board Members.	Variable (Single year)	Cash	0	
	• Bonuses are determined and paid on an individual basis after deciding whether or not bonuses will be paid and what the total amount will be based on the previous year's consolidated earnings and other factors.				
Bonus	• During the period of Midterm Corporate Strategy 2018 (fiscal year ended March 31, 2017 to fiscal year ending March 31, 2019), the amounts of bonuses to be paid will be determined based on the achievement of a level of earnings that leads to improved corporate value (consolidated capital cost) and initial business targets, and an upper limit is set for the total amount to be paid. If consolidated net income (attributable to owners of MC) exceeds the consolidated capital cost, the amount to be paid will be increased in line with business performance. Meanwhile, if consolidated net income is less than the consolidated capital cost or the initial business targets, no bonuses will be paid.	Variable (Single year)	Cash	Paid upon resolution of the Ordinary General Meeting of Shareholders	
Stock-option-based Remuneration	Stock options as remuneration are grants from the perspective of aligning Directors' interests with those of shareholders and creating value over the medium and long terms. Stock options cannot be exercised for two years from the date they are granted. As a basic policy, In-house Directors cannot sell shares, including shares acquired by exercising stock options, during their terms of office until their shareholdings reach a certain level.	Variable (Medium to long term)	Shares (Stock acquisition rights)	0	
Reserved Retirement Remuneration	Reserved retirement remuneration is set aside in a certain amount every year as con- sideration for the performance of duties, and the accumulated amount is calculated and paid in full upon retirement of a Director by resolution of the Board of Directors.	Fixed	Cash	0	

*1. "Fixed" indicates a fixed payment amount and "Variable" indicates a payment amount that varies based on performance and other factors. "Single year" indicates amounts that correspond to performance or individual performance assessment of the previous fiscal year ended march 31. "Medium to long term" is used for stock options as remuneration to indicate their role as a medium- to long-term incentive.

*2. "O" indicates remuneration paid by a resolution of the Board of Directors within the ¥1.6 billion per annum limit approved by the 2010 Ordinary General Meeting of Shareholders.

Conceptual Image of the Payment Mix of Remuneration for Directors Responsible for Business Execution



Audit

Audit & Supervisory Board Member Audits

The two in-house Audit & Supervisory Board Members have experience in Mitsubishi Corporation's corporate planning department as well as finance and accounting departments, and they are appointed as the full-time Audit & Supervisory Board Members. Two of the three Outside Audit & Supervisory Board Members have many years of experience as an attorney (corporate law) and a certified public accountant, respectively, while the other has experience as a fulltime Audit & Supervisory Board Member at a listed company. Of the five Audit & Supervisory Board Members, the two full-time Audit & Supervisory Board Members, the two full-time Audit & Supervisory Board Members and Outside Audit & Supervisory Board Member Ikuo Nishikawa have a considerable degree of knowledge and experience concerning finance and accounting.

One of the full-time Audit & Supervisory Board Members

Internal Audits

Regarding internal audits, the Internal Audit Department (which had 77 members as of April 1, 2018) conducts audits of Mitsubishi Corporation, overseas regional subsidiaries and affiliated companies from a Company-wide perspective. In addition, each business group has established its own internal audit organization, which audits the operations that fall under its group organization on a heads the Audit & Supervisory Board as Senior Audit & Supervisory Board Member and is also the specified Audit & Supervisory Board Member stipulated by the law. Audit & Supervisory Board Members are assisted as needed by the five-member Audit & Supervisory Board Members' Office (as of April 1, 2018), which is an independent organizational body.

Audit & Supervisory Board Members attend important in-house meetings, and hold discussions with internal departments, including important offices in Japan and overseas. At the same time, Audit & Supervisory Board Members hold regular meetings with Mitsubishi Corporation's independent auditors and Internal Audit Department, to accurately and in a timely manner grasp Mitsubishi Corporation's situation through close cooperation.

consolidated basis. These internal audits are based on annual audit plans and are conducted after selecting audit targets. The results of audits are reported each time to the President and CEO, Audit & Supervisory Board Members and other concerned parties. They are also reported regularly to the Board of Directors and the Executive Committee.

Accounting Audits

The four certified public accountants who carried out the accounting audit of Mitsubishi Corporation were Yoshiaki Kitamura, Kazuaki Furuuchi, Kenichi Yoshimura and Noriaki Kobayashi of Deloitte Touche Tohmatsu LLC. They were assisted by 34 certified public accountants, 19 junior accountants and 59 other staff.

Mutual Cooperation among Audit & Supervisory Board Member Audits, Internal Audits and Accounting Audits, and their Relationship with Internal Control Departments

The Audit & Supervisory Board Members, Internal Audit Department, Risk Control & Internal Control Office, and Independent Auditors regularly exchange information among each other in order to strengthen their cooperation. Moreover, the full-time Audit & Supervisory Board Members exchange information with the executive officers and the Audit & Supervisory Board Members of subsidiaries considered important from a consolidated management perspective.

Fees paid to Mitsubishi Corporation's independent auditors Deloitte Touche Tohmatsu LLC for the fiscal year ended March 31, 2018 were as follows:

- (a) Amount of fees for services in accordance with the first clause of Article 2 of the Certified Public Accountant Law of Japan (Law No. 103, 1948) (Note 1) ¥797 million
- (b) Amount of fees for services other than those prescribed in the first clause of Article 2 of the Certified Public Accountant Law of Japan (Note 2) ¥24 million
- (c) Total amount of fees to be paid by Mitsubishi Corporation and consolidated subsidiaries (Note 3) ¥2,469 million
- Notes: 1. Fees for services prescribed in the first clause of Article 2 of the Certified Public Accountant Law of Japan (Law No. 103, 1948) are fees, etc. for audit certification services relating to English language financial statements prepared based on International Financial Reporting Standards (IFRS) and audit certification based on the Companies Act and the Financial Instruments and Exchange Act.
 - 2. Fees for services other than those prescribed in the first clause of Article 2 of the Certified Public Accountant Law of Japan are fees for Mitsubishi Corporation training, overseas tax return work, etc.
 - 3. Some subsidiaries are audited by certified public accountants or independent auditors (including persons with qualifications equivalent to these qualifications in overseas countries) other than Mitsubishi Corporation's independent auditors.

Shares

Stance on Exercising Voting Rights Relating to Listed Stocks

MC attaches great importance to dialogue and communication with its business investees through various channels, aiming to create business opportunities and build, maintain and strengthen business and partner relationships from the perspective of raising the mid- and long-term corporate value of Mitsubishi Corporation and these companies. Mitsubishi Corporation considers exercising voting rights to be an important approach. For this reason, when exercising voting rights relating to a business investee, the responsible department for the oversight of the company reviews its business conditions (earnings, capital efficiency, etc.) from both quantitative and qualitative standpoints in accordance with internal regulations. These regulations stipulate matters to be considered, etc., when determining whether to vote for or against proposals such as appropriation of surplus, election of Directors and Audit & Supervisory Board Members, and revision of executive remuneration. Then Mitsubishi Corporation exercises its voting rights appropriately for individual matters for resolution.

Guideline for Holding MC Shares (Standard)

MC has adopted variable remuneration including not only cash remuneration linked to consolidated business results and individual performance but also stock remuneration (stock-option-based remuneration) to provide further incentive to improve corporate value over the medium and long terms.

Shareholder Rights

Reference: Share Handling Regulations https://www.mitsubishicorp.com/jp/en/ir/library/share/pdf/share.pdf

Reference: Articles of Incorporation (Chapter 2 Article 9) https://www.mitsubishicorp.com/jp/en/ir/library/articles/pdf/articles.pdf

Initiatives on Japan's Corporate Governance Code

MC has long worked to implement corporate governance as the foundation of sound, transparent and efficient management. We have determined that MC is implementing all principles set forth in Japan's Corporate Governance Code. (For more information, please see the Corporate Governance Report on MC's website.)

MC's Stance on Acquisition, Holding, and Reduction in Holding of Listed Shares

Holding of listed shares reduced by 10% (compared to the previous year) after reviewing significance

MC may acquire and hold shares and equity stakes of non-affiliated companies ("General Investment Shares")*, as a means of creating business opportunities and building, maintaining and strengthening business and partner relationships. Cross-shareholdings are included in these General Investment Shares.

When acquiring General Investment Shares, MC judges whether or not to make the acquisition based on the significance and economic rationale of the purchase, periodically reviews its holding policy after an acquisition and promotes reducing holdings of

Stance on Acquiring and Holding Listed Stocks

Matters Examined by the Board of Directors

Of the General Investment Shares held on a consolidated basis, for the stocks of major listed companies^{*}, each year the Board of Directors verifies the result of reviewing its holding policy for each stock from the perspective of economic rationality and significance. The verification result as of March 31, 2018 was as follows:

 The economic rationality is verified for each individual share by comparing the earnings related to each share, such as dividends and related earnings on transactions, to see whether they are higher than Mitsubishi Corporation's target capital cost. The related earnings for the majority of shares subject to verification was confirmed to be higher than such capital cost.

- In addition to the above, the Board of Directors confirmed the

stocks with decreased significance.

Moreover, MC confirms the significance of holding shares of major listed companies, included in General Investment Shares, from a Companywide management perspective, and regular verifications by the Board of Directors will be discussed later. In addition to the scheme described above, MC has a policy for proactively reorganizing its portfolio and sold approximately 0.1 trillion yen in listed shares, previously included in General Investment Shares, on a consolidated and market value basis during the fiscal year ended March 31, 2018, reducing its holdings by 10% year on year.

* General Investment Shares include listed and unlisted shares. All General Investment Shares are included under "Other investments" on the consolidated balance sheets.

significance of holding each share. For those that were to be held continuously, the Board of Directors confirmed that the purpose of holding the shares is to maintain and strengthen business relationships with investment destinations and promoting joint ventures, etc.

 The Board of Directors also confirmed shares that it would consider selling after examining the significance of holding them going forward, since their expected purpose or the significance of holding them has become unclear, etc.

^{*} The total market value of Mitsubishi Corporation's holdings subject to verification as of March 31, 2018 was approximately 0.7 trillion yen (acquisition price was approximately 0.3 trillion yen), representing approximately 80% of the total market value of Mitsubishi Corporation's holdings of listed shares on a consolidated basis.

Corporate Governance

MC's Pension Management Structure

Operation by experienced experts and appropriate monitoring

In an effort to utilize personnel with experience in markets and investment, those responsible for pension management are appointed from the Finance Department of MC and serve concurrently as employees of the Mitsubishi Corporation Pension Fund. The basic policy and management guidelines for safe and efficient management of the reserve are drafted and issued to institutions contracted to undertake management, which are then monitored constantly. Rules governing the fund prevent inappropriate administration and management of the reserve for the benefit of one's self or an independent party other than the fund. Moreover, Mitsubishi Corporation Pension Fund elects four directors to execute the fund's operation and two auditors to audit its operations. Officers in these positions are rotated after a certain period based on their decided terms of office.

< Announcement of Acceptance of Japan's Stewardship Code in the Fiscal Year Ending March 31, 2019 >

Marked with the responsibility for autonomous allocation of the assets it holds, the fund has announced its acceptance of Japan's Stewardship Code and requires the institutions entrusted with management of the assets to perform stewardship activities.

Policy and Procedures for Appointment and Dismissal of Management Executive and Appointment of Nominated Directors and Audit & Supervisory Board Members

Ensuring objectivity and transparency through deliberation at the Governance, Nomination and Compensation Committee, where Outside Directors, Outside Audit & Supervisory Board Members and other experts from outside MC have a majority

For the appointment of the President and CEO, the requirements of the role, the basic policy on appointment, and selection of individual candidates are deliberated and reviewed by the Governance, Nomination and Compensation Committee, where Outside Directors, Outside Audit & Supervisory Board Members and other experts from outside MC have a majority (4 Outside Directors and 1 Outside Audit & Supervisory Board Member out of 8 Committee Members). Appointments are then decided by the Board of Directors, which also appoints and assigns duties to Executive Officers.

Moreover, the policy and process for appointment and all appointment proposals of Directors and Audit & Supervisory Board Members are deliberated by the Governance, Nomination and Compensation Committee and resolved by the Board of Directors, before being presented at the Ordinary General Meeting of Shareholders.

Furthermore, the Company's policy is to take a flexible approach to determining and dealing with dismissal of the President and CEO who is the chief executive officer. The matter is deliberated by the Governance, Nomination and Compensation Committee and resolved by the Board of Directors.

Corporate Governance

Details of Retired Executives Currently Serving in Advisory Positions

Honorary Chairman to receive no remuneration (2020 onward), no further appointment of Senior Corporate Advisor to be made

MC appoints, as necessary, retired executives (presidents and chairmen of the board) to the positions of Honorary Chairman and Senior Corporate Advisor. Currently, one Honorary Chairman and two Senior Corporate Advisors are appointed. Neither the Honorary

Chairman nor the Senior Corporate Advisors serve as directors. They do not participate in internal management meetings and are not involved in the Company's decision-making process. They mainly engage in activities that carry high social significance for the Company's external affairs, as requested. With effect from July 2020, the Honorary Chairman will execute his duties on a part-time basis with no remuneration. No new Senior Corporate Advisors will be appointed with immediate effect.

Names, positions, and other information related to retired executives currently	serving in advisory positions
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Name	Position	Area of assignment	Work conditions (full/part-time, remunerated, etc.)	Date of retirement as President, etc.	Term end
Minoru Makihara	Senior Corporate Advisor	External affairs	Part-time, remunerated	March 31, 2004	March 2019
Mikio Sasaki	Senior Corporate Advisor	External affairs	Part-time, remunerated	June 23, 2010	June 2020
Yorihiko Kojima	Honorary Chairman	External affairs	Full-time, remunerated	March 31, 2016	June 2022

(Note) The dates of retirement as President are the respective dates of retirement from appointment as chair of the Board of Directors.

Number of retired executives currently serving in advisory positions: 3

Policy on Diversity, Size and Balance of Knowledge, Experience and Capability for the Board of Directors

Appointment of internal and external personnel with the depth of experience and high levels of knowledge and expertise needed for fulfilling duties

MC stipulates its stance on diversity, size and balance of knowledge, experience and capability for the Board of Directors in

Composition of the Board of Directors and Policy on Appointment of Candidates and Selection Criteria for Outside Directors.

Policy

MC defines compliance as observance of laws, rules, regulations, international standards and internal regulations, and respect for generally accepted standards for the conduct of business. In addition to 1) observance of laws and regulations, all officers and employees at the MC Group are also obliged to consider 2) observance of internal rules and regulations and 3) generally accepted standards for the conduct of business. Officers and employees must consider at all times what these standards entail in the present-day context, as there are no clearly stated rules in this regard. Corporate officers and employees are aware of the high expectations of society and aim to ensure the MC Group remains a trusted company.





1) Laws and regulations, international rules

2) Internal rules and regulations, policies

 Proper consideration for generally accepted social norms for the conduct of business

Under the Three Corporate Principles, which constitute MC's corporate philosophy, MC's Corporate Standards of Conduct serve to regulate the Company, and the MC Code of Conduct serves to regulate all officers and employees.

The basic policy of the MC Code of Conduct states that "All officers and employees of MC must comply with all applicable laws, rules and regulations where they operate, international standards and rules, and all internal corporate rules and policies. In addition, all officers and employees of the Company must act in a socially responsible manner by complying with the highest ethical standards in the conduct of their business." Compliance at MC goes beyond simply complying with laws. Acts that go against

generally accepted social norms for the conduct of business must not be carried out regardless of their legality.

With the goal of instilling internal understanding of the MC Code of Conduct, business card-sized MC Employee Pocket Handbooks are prepared and distributed to all officers and employees. In addition to the basic principles, the handbook contains the contact details for compliance mail boxes and helplines (whistleblowing helplines). Officers and employees carry this handbook at all times in order to confirm the details whenever necessary. Moreover, each year officers and employees are required to take e-learning courses, which include case studies on the Code of Conduct and to pledge that they understand and will adhere to the Codes at all times.

Structure

Investigations of Compliance Violations and Response Systems

Compliance Framework

At MC, the Compliance Committee and the Compliance Officer system play important roles in implementing compliance.

As an advisory body to the Chief Compliance Officer, the Compliance Committee prepares and disseminates information about Company-wide compliance measures. The Compliance Committee is led by the Chief Compliance Officer, who is appointed by the president, and meets twice a year in principle.

The Chief Compliance Officer is in charge of matters concerning compliance as a whole at MC, and is responsible for planning and implementing compliance-related measures. The Chief Compliance Officer also has the authority to conduct any necessary investigations in the event of a breach of compliance or possible breach and can also order the suspension or improvement of the business activities concerned. In addition, MC has appointed a Compliance Officer in each corporate and business group at the Head Office, domestic branch, and overseas administrative region. Each Compliance Officer possesses a similar level of authority, and they implement compliance in a manner tailored to their business characteristics.



Response Systems for Individual Cases

Officers and employees of MC are required to report to or consult with managers of organizational bodies if they become aware of a compliance violation or potential compliance violation. The managers of organizational bodies must in turn report to or consult with a Compliance Officer, who is then required to report to the Chief Compliance Officer. Furthermore, cases of violations and the status of resolutions reported to the Chief Compliance Officer, including cases for which reports or notifications have been received from Group Companies, are also reported to the Audit & Supervisory Board Members.

Compliance Officers conduct the necessary investigation of the reported matter, mindful of not infringing on the human rights or dignity of concerned parties. The findings are reported to the Chief Compliance Officer, and measures are planned and implemented to prevent any reoccurrence.

Initiatives for Preventing Corruption

MC has established the "Code of Prohibition against Improper Payments or Other Types of Benefits" in order to prevent such bribery benefits to public officials, etc., and so as to not invite external suspicion or mistrust. Furthermore, MC has established a strict anti-corruption system by setting specific guidelines regarding the provision of entertainment or gifts to public officials, etc., and regarding the appointment of agents, etc. Most recently, the Company has established various internal regulations regarding accepting workplace experience training for relatives of public officials, etc., as well as regarding donations related to government and public officials. MC has established a system to scrutinize the regulations' contents in advance from the perspective of preventing corruption.

MC has further continued to build and operate an effective system for anti-corruption by frequently amending the Company rules and revising the internal system based on the actions of various nations' authorities as well as on actual instances of enforcement within those nations. In 2016, the Company aimed to build a more effective system and underwent a third-party assessment by external experts regarding the Company's overall approach to preventing corruption. Utilizing the experts' evaluations and recommendations, MC is committed to continuously improving its anti-corruption procedures and ensuring that they operate effectively.

MC's Anti-Corruption Guideline

In 2015, MC established and published "Mitsubishi Corporation's Anti-Corruption Guideline" in order to inform its business partners of MC's fundamental approach to the prevention of corruption. MC communicates its policies and initiatives in this Guideline and expects its business partners to adhere to the Company's principles related to anti-corruption and bribery.

Reference: Mitsubishi Corporation's Anti-Corruption Guideline https://www.mitsubishicorp.com/jp/en/about/ governance/pdf/compliance_02_e.pdf

Supervision by Members of the Board

Every year, the Board of Directors receives reports regarding compliance initiatives, including anti-corruption initiatives, and the status of compliance violation cases, together with reports regarding the policies for compliance activities applied during the

Initiatives in Selecting and Managing Intermediary Agencies, etc.

To prevent corruption by any Company-retained agencies, agents, consultants, etc. (hereafter referred to as "agencies"), as well as by the Company's officers and employees, the following guidelines have been formulated. MC is required to appoint only qualified agencies after obtaining the approval of the Compliance Officer.

- In order to judge the eligibility of agencies, the agencies should have no relationship with any public officials who can influence the business transactions and dealings related to the purpose of the appointment, and the agencies should be carefully examined regarding their business approach, including their past compliance status as agencies, regarding whether they possess the proper qualifications, and regarding their capabilities of business execution.
- The agencies should be thoroughly assessed to confirm their suitability for providing their business services.
- Contracts with agencies should include clauses that prevent bribery benefits to public officials, etc., from the agencies, and the agencies should be made aware of MC's Anti-Corruption Guidelines.

Cases of Corruption

In the fiscal year ended March 2018, there were no cases of corruption detected in the Company. As a result, no fines or financial penalties were incurred.

fiscal year. In addition, both Outside Directors and Outside Audit & Supervisory Board Members receive reports twice a year regarding compliance activities, so that they can provide more effective supervision based on external perspectives.

Monitoring System

Monitoring of Individual Cases

All reports regarding the facts and causes of any individual compliance incident that has occurred, together with any measures to prevent recurrence, are shared with the Administration Office for the Compliance Committee and are used for conducting analyses, assessing risks and formulating various policies.

Compliance Awareness Survey

This survey assesses the level of compliance awareness and the ethics environment in the workplace, and the results are used in planning and enacting compliance initiatives at MC. An external survey institution was appointed by MC to carry out MC's survey regarding the level of awareness of compliance. MC conducted the survey at MC in 2009, 2014 and 2017. MC Group companies began conducting the survey in 2009, and have conducted the survey every year thereafter. In 2018, 66 Group companies participated in the survey.

This survey is viewed as an important initiative for assessing and evaluating the current status of the Company because it can confirm compliance awareness penetration and the ethical environment in the workplace at the individual officer and employee level. MC implements measures to surmount issues identified by the previous survey, and conduct a follow-up survey to confirm the effectiveness of those measures.

Internal Whistleblowing System

MC has set up various internal whistleblowing systems, collectively known as the "Mail Box and Helpline" which report directly to the Administration Office for the Compliance Committee. The systems are consultation hotlines for any compliance-related questions or problems, including workplace misdeeds and harassment, violations of laws and regulations, and prevention of bribery and corruption. MC has also established a mail box route directly to the Internal Audit Dept. and the Audit & Supervisory Board Members. In addition, MC has established a consultation hotline enabling contact with outside legal counsel for officers and employees who wish to remain anonymous. While the outside legal counsel will confirm whether the informant is employed, they will not reveal the name and organizational position of the person to the Administration Office for the Compliance Committee without the informant's consent.

Responses to Risk Factors by Each Business

MC regularly conducts self-assessments of the compliance risks to which special attention should be given, including cases of antitrust, corruption including bribery, and breaches of employees' safety and health, taking into account industry characteristics, product characteristics, business area, etc. Each business group's Compliance Officer is engaged in risk management initiatives related to the risks to which special attention should be given in each business domain.

PDCA Cycle

Based on the results of the various surveys, reports and monitoring results, together with the opinions and ideas of the Compliance Officer of each business group and region, MC utilizes the PDCA cycle and implements necessary measures, including conducting various types of seminars and formulating a variety of internal regulations. The results are further monitored, and the analysis of the results is reflected in the further identification and evaluation of risks. The aim is to improve the awareness and knowledge about compliance of all officers and employees by repeatedly and rigorously educating personnel about the topic.

There is also a compliance Mail Box and Helpline for MC Group company officers and employees.

Furthermore, in 2016 MC launched a new global whistleblowing system for anti-trust and anti-corruption issues (called "LUKS"), which makes it easier for officers and employees of MC and its subsidiaries to report these issues.

After receiving details of a whistleblowing case, the Administration Office for the Compliance Committee will share the information only with limited parties to confirm the facts and take necessary action. When taking action, the Administration Office for the Compliance Committee safeguards the rights of the informant and strictly prohibits any disadvantageous treatment of the informant by relevant parties. Environmental

Compliance Framework



* An internal whistleblowing system that enables employees to make a report anonymously.



Number of Whistleblowing Reports

Performance

Results of Compliance Training

MC conducts in-house training programs on a Company-wide basis according to level in the organization. Compliance-related training is offered on individual topics such as antitrust laws, the Subcontract Act, prevention of bribery and corruption including anti-bribery laws, and labor management. Furthermore, seminars are held for each business group and region according to business group and regional characteristics. MC holds over 450 internal seminars worldwide every year.

Moreover, the Company has created an e-learning program related to the MC Code of Conduct based on the latest case studies. Every year, all officers and employees complete this program.

Compliance Discussions

In 2013, MC began holding compliance discussions in which small groups of employees in each workplace discuss compliance issues that could occur in the workplace as well as day-to-day concerns. These discussions serve as a means of supplementing conventional training, which tends to be a one-way form of communication, and of improving the compliance awareness of every officer and employee. By facilitating workplace discussion about familiar topics, each employee will recognize that compliance is something which is connected to them, which will in turn gradually increase their awareness of compliance. Furthermore, the compliance discussions are intended to be established in each workplace in order for these types of discussion to begin voluntarily. MC has been conducting compliance discussions at all internal organizations since 2013, and the Company has also expanded this initiative to over 100 domestic and overseas subsidiaries.

Distribution of Handbook for Officers and Employees

In addition to providing training opportunities and the e-learning program, MC has created a Compliance Handbook that presents a collection of the latest case studies in a Q&A format. The aim of this booklet is to resolve any doubts about the compliance duties of officers and employees that they may have on a daily basis, and MC distributes the booklet to all officers and employees.

Moreover, in 2016, MC created the Anti-Corruption Handbook to disseminate accurate information about the prevention of acts of corruption, including bribery and related regulations in major countries. The handbook includes actual examples of enforcement from recent years, and also presents MC's internal initiatives to prevent bribery and corruption. The handbook has been distributed to all officers and employees.

Number of Compliance Violations

The total number of violations at the Head Office, domestic and overseas branches and offices, and domestic and overseas subsidiaries that were reported in the fiscal year ended March 2018 was 312. No compliance violation had a significant impact on the management of the Company or its subsidiaries.

Provisions Concerning Legal Violations and Litigation

If a provision is recognized when the Company has a present obligation (legal or constructive) as a result of a past event, it is likely that the Company will be required to settle the obligation, and a reliable estimate can be made of the amount of the obligation. If the obligation is a fine, settlement fee, etc., the financial amount will be recorded as a provision. As of the end of March 2018, there were no significant provisions requiring separate disclosure.

Policy

MC has a basic policy aiming to maintain and improve its financial soundness and corporate value by ascertaining the various risks associated with its business activities, designating these risks into categories based on their individual characteristics, and managing them accordingly. In particular, MC works on a consolidated basis to ascertain and analyze the risks that could potentially have a significant impact on its financial status or reputational standing.

Risk Management System

Overview

MC maintains the following Risk Management System under the aforementioned policy.

- The Executive Committee, a management decision-making body, determines basic policies on risk management as well as individual and integrated risk management items. It also makes decisions about advancing individual projects, and presents matters for the Board of Directors' agenda based on prescribed standards.
- MC has established and maintains an overall system to review individual projects and internal systems in relation to specific types of risk through deliberative bodies under the Executive Committee including the Investment Committee, the Sustainability & CSR Committee, the Compliance Committee and the Human Resources Development (HRD) Committee.
- MC has designated categories of business activity risk corresponding to the details and scale of each risk, including credit, market, business investment, country, compliance, legal, information management, environmental and natural disaster-related risks, and has specified departments responsible for each category.

With respect to individual projects, personnel responsible for the applicable department in charge of a project make decisions within the scope of their prescribed authority after analyzing and assessing the risk-return profile of each project in accordance with Company-wide policies and procedures. Projects are executed and managed on an individual basis in accordance with this approach. Further, in response to the progress of projects or changes in the external environment, MC conducts periodic verification of risk-return profiles.

In addition to managing risk on an individual project basis, MC assesses risk on a consolidated basis with respect to risks that are capable of being monitored quantitatively and manages these risks properly, making reassessments as necessary.

Management Framework for Individual Proposal

New proposals	Policy proposals/ Execution proposals:	MC makes selections by evaluating qualitative aspects including alignment with each Business Group's strategy as well as presence of risks and related response measures.				
Existing business proposals Management plans:		Once a year, MC monitors the status of its business investments, including management issues and action plans, MC's function and the business lifecycle, etc. / Investments subject to monitoring are selected with the aim of following the progress of business management for each Business Group, and the results are reported to the Executive Committee.				
Re-profiling proposals	Reviews of business continuity:	Based on the prioritizations in Business Group strategies, MC evaluates qualitative and quantitative aspects from the same perspectives as for new loan and investment proposals, promoting a healthy metabolism.				

Screening Process for Proposals



Although some authority is delegated to Business Groups depending on the financial scale of a proposal, MC has established a system for all new investment and exit proposals that will be deliberated by the Executive Committee and the Board of Directors to first be deliberated by the Investment Committee.

The Corporate Functional Officer in charge of Business Investment Management and Corporate Sustainability is a member of the Investment Committee, and General Managers of relevant corporate departments and Business Group representatives have also been selected as members in order to utilize the expert viewpoints of each corporate department as well as the knowledge of the Business Groups. Through this system, MC conducts a comprehensive screening process that includes non-financial aspects. Environmental

Social

Risk Management

Corporate Management Framework



BCP (Business Continuity Plans)

MC engages in rigorous crisis management on a consolidated basis, including individual MC Group companies, in light of the increasing diversity and complexity of risk that accompanies business expansion.

A Business Continuity Plan (BCP) refers to an action plan formulated in advance with the aim of preventing the stoppage of prioritized company operations or restoring and restarting them in as little time as possible if they are interrupted by the occurrence of an unexpected event such as a natural disaster or incident. MC has formulated BCPs for different types of crises such as major natural disasters, new infectious diseases, international or political problems including terrorism, and accidents. MC will immediately initiate its own BCP in the event of such crises and work to, at minimum, ensure the continuity of prioritized operations and to quickly restore operations.

(Reference) Formulation of BCP in the Event of a Large-Scale Earthquake in Japan

- Select prioritized operations (vital operations that must be restored quickly or for which stoppage is unacceptable), designate the personnel or staff required to perform these operations and formulate an implementation structure and implementation methods
- Specify estimations of earthquake damage
- Confirm contact points with important business suppliers and share content of BCP
- Determine safety management policies and thoroughly understand the situation of important suppliers and contractors

Independent Auditors

The MC Audit & Supervisory Board deliberates on appointments, dismissals, reappointments and non-reappointments of MC's Independent Auditors, and each year assesses appropriateness of the audit methods and the audit results. If the Audit & Supervisory Board deems it fit to dismiss or to not reappoint Independent Auditors, a proposal for new Independent Auditors shall be submitted to the General Meeting of Shareholders.

Main Duties under the Jurisdiction of Corporate Functional Officers

Name	Duties Overseen	Organization under the Executive Committee
Kanji Nishiura	Corporate Functional Officer, Global Strategy & Coordination, Global Research, International Economic Cooperation, Logistics Management	Person Responsible for Security Trade Control, Person Responsible for Trade Procedures Control
Kazuyuki Masu	Corporate Functional Officer, Chief Financial Officer, IT	Chair, Disclosure Committee
Iwao Toide	Corporate Functional Officer, Business Investment Management, Corporate Sustainability, Al/IoT	Chair, Investment Committee, Sustainability & CSR Committee, Al/IoT Committee
Akira Murakoshi	Corporate Functional Officer, Corporate Communications, Human Resources	Chair, Human Resources Development (HRD) Committee
Masakazu Sakakida	Corporate Functional Officer, Corporate Administration, Legal, Chief Compliance Officer	Chair, Compliance Committee Officer, Emergency Crisis Management Headquarters (Japan & Overseas / New Infectious Diseases, Compliance)
Mitsumasa Icho	Corporate Functional Officer, Regional Strategy for Japan	

Reference: For information on measures to address various ESG-related risks, please see the risk management information provided in each section.

Outside Directors' Principal Area of Specialization and Background

To make the function of Outside Directors and Outside Audit & Supervisory Board Members stronger and more transparent, MC has set forth Selection Criteria for Outside Directors and Outside Audit & Supervisory Board Members as follows, after deliberation by the Governance & Compensation Committee, which is composed of a majority of Outside Directors, Outside Audit & Supervisory Board Members and Outside Members.

(Outside Directors)

[Selection Criteria for Outside Directors]

- Outside Directors are elected from among those individuals who have an eye for practicality founded on a wealth of experience as corporate executive officers, as well as an objective and specialist viewpoint based on extensive insight regarding global conditions and social and economic trends. Through their diverse perspectives, Outside Directors help ensure levels of decision-making and management oversight appropriate to the Board of Directors.
- 2. To enable Outside Directors to fulfill their appointed task, attention is given to maintain their independency; individuals incapable of preserving this independency in effect will not be selected to serve as Outside Directors.
- 3. MC's operations span a broad range of business domains; hence there may be cases of conflict of interest stemming from business relationships with firms home to a corporate executive officer appointed as Outside Directors. MC appropriately copes with this potential issue through the procedural exclusion of the director in question from matters related to the conflict of interest, and by preserving a variety of viewpoints through the selection of numerous Outside Directors.

			Principal	area of specializ background	ation and	Board of	Status of membership on advisory bodies to the Board of Directors		
	Independen Director	Main career		Global developments	Socio-economic trends	Directors	Governance, Nomination and Compensation Committee	International Advisory Committee	Years served as
	Director		Corporate management			Attendance in fiscal year ended March 31, 2018	Attendance in fiscal year ended March 31, 2018		Director
Akihiko Nishiyama (65)	٠	Professor, Ritsumeikan University				14/14 meetings	● (3/3 meetings)	—	3 years
Hideaki Omiya (71)	٠	Chairman of the Board, Mitsubishi Heavy Industries, Ltd.				12/14 meetings ^{*1}	_	_	2 years
Toshiko Oka (54)	٠	CEO, Oka & Company Ltd. Business consultant				14/14 meetings	(3/3 meetings)	_	2 years
Akitaka Saiki (65)	٠	Former Vice-Minister for Foreign Affairs, Ministry of Foreign Affairs of Japan				10/10 meetings ^{*2}	(3/3 meetings)	(1/1 meeting)	1 year
Tsuneyoshi Tatsuoka (60)	٠	Former Vice-Minister of Economy, Trade and Industry, Ministry of Economy, Trade and Industry				_	(2/2 meetings*3)	(1/1 meeting)	Appointed in June 2018

*1 Mr. Omiya was asked to refrain from attending one of the Board of Directors meetings because of conflict of interest in connection with tender offer for shares in Mitsubishi Motors Corporation.

*2 Describes status since appointment as a Director on or after June 23, 2017.

*3 Describes status since appointment (then advisor) to the Governance, Nomination and Compensation Committee on or after January 1, 2018.

(Outside Audit & Supervisory Board Members)

[Selection Criteria for Outside Audit & Supervisory Board Members]

- 1. Outside Audit & Supervisory Board Members are selected from among individuals who possess wealth of knowledge and experience across various fields that is helpful in performing audits. Neutral and objective auditing, in turn, will ensure sound management.
- 2. To enable Outside Audit & Supervisory Board Members to fulfill their appointed task, attention is given to maintain their independency; individuals incapable of preserving this independency will not be selected to serve as Outside Audit & Supervisory Board Members.

Name	Independent		Principal area of specialization and background			Attendance in fiscal year		Status of membership on advisory bodies to the Board of Directors		Veers con red
	Independent Audit & Supervisory Board		Socio-	Legal affairs	Finance and	ended March 31, 2018		Governance, Nomination and Compensation Committee	International Advisory Committee	 Years served as Audit & Supervisory Board
	Member		economic trends			Board of Directors	Audit & Supervisory Board	Attendance in fisca March 31, 2		Member
Tadashi Kunihiro (62)	•	Attorney at T. Kunihiro & Co., Attorneys-at-Law				14/14 meetings	13/13 meetings	(3/3 meetings)		6 years
lkuo Nishikawa (67)	•	Former Professor, Faculty of Business & Commerce of Keio University Certified Public Accountant				14/14 meetings	13/13 meetings	_	_	2 years
Yasuko Takayama (60)	٠	Former Audit & Supervisory Board Member, Shiseido Company, Limited				14/14 meetings	13/13 meetings	_		2 years

Independent Practitioner's Assurance



Externally Disclosed Information/Reporting Scope/Reference Guidelines/Publication Time

MC discloses information externally through the following media in accordance with its Corporate Disclosure Policy*.

- Integrated Report 2018 https://www.mitsubishicorp.com/jp/en/ir/library/ar/
- Management's Discussion and Analysis of Financial Condition and Results of Operations https://www.mitsubishicorp.com/jp/en/ir/library/afr/pdf/afr2018.pdf
- Voting Results of 2018 Ordinary General Meeting of Shareholders https://www.mitsubishicorp.com/jp/en/ir/adr/sh_meeting/pdf/result_2018.pdf
- Notice of 2018 Ordinary General Meeting of Shareholders https://www.mitsubishicorp.com/jp/en/ir/adr/sh_meeting/pdf/shoshu_2018.pdf
- Investors' Note Nov. 2018 No. 47 https://www.mitsubishicorp.com/jp/en/ir/library/notes/
- 2018 Corporate Brochure https://www.mitsubishicorp.com/jp/en/about/cguide/
- Corporate Governance Report https://www.mitsubishicorp.com/jp/en/about/governance/pdf/governance_report_e.pdf
- Mitsubishi Corporation Compliance Report https://www.mitsubishicorp.com/jp/en/about/governance/pdf/compliance_01_e.pdf
- MC's Social Contributions https://www.mitsubishicorp.com/jp/en/csr/library/40years/

Reference: Information about MC's Corporate Disclosure Policy can be found here. https://www.mitsubishicorp.com/jp/en/about/philosophy/policy.html

Reporting Scope

MC and all consolidated Group companies

* In some cases, data is available only for MC on a non-consolidated basis. MC will strive to collect and disclose data on a consolidated basis going forward.

Main Reference Guidelines

- Global Reporting Initiative (GRI) GRI Standards
- International Organization for Standardization ISO 26000
- The International Integrated Reporting Council (IIRC) International Integrated Reporting Framework
- Final Report : Recommendations of the Task Force on Climate-related Financial Disclosure (TCFD)

Notice Regarding Outlooks

Outlooks contained in this document are based on currently available predictions, budgets, forecasts and plans, as well as on the judgement of MC management. These predictions, budgets, forecasts and plans include many potential risks, uncertain factors and assumptions. Actual outcomes may differ greatly from MC's outlooks due to developments around key factors.

Among the risks, uncertain factors and assumptions that could impact MC's financial performance, besides those contained in this document, other factors include commodity market conditions, exchange rates, the economic situation surrounding MC's business areas, results of pending and future litigation and the continued utility of procured funds, financial products and resources, etc. However, elements that may affect business performance are not limited to these factors.