

DEFENCE COMPANIES INDEX (DCI) ON ANTI-CORRUPTION AND CORPORATE TRANSPARENCY 2020

FINAL ASSESSMENT

MITSUBISHI ELECTRIC CORPORATION


The following pages contain the detailed scoring for this company based on publicly available information.

The table below shows a summary of the company's scores per section:

| Section | Number of Questions* | Score Based on Publicly Available Information |
|--|----------------------|---|
| 1. Leadership and Organisational Culture | 4 | 6/8 |
| 2. Internal Controls | 6 | 3/12 |
| 3. Support to Employees | 7 | 3/14 |
| 4. Conflict of Interest | 4 | 0/8 |
| 5. Customer Engagement | 7 | 0/14 |
| 6. Supply Chain Management | 5 | 3/10 |
| 7. Agents, Intermediaries and Joint Ventures | 10 | 1/20 |
| 8. Offsets | 4 | 0/8 |
| 9. High Risk Markets | 4 | 5/8 |
| 10. State-Owned Enterprises | 0 | N/A |
| TOTAL | | 21 / 102 |
| BAND | | E |

*This column represents the number of questions on which the company was eligible to receive a score; i.e. where the company did not receive a score of N/A.

1. Leadership and Organisational Culture

| Question |
|---|
| 1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership? |
| Score |
| 2 |
| Comments |
| There is evidence that the company has a publicly stated anti-bribery and corruption commitment, which details the company's stance against any form of bribery or corruption within the organisation. It is clear that this commitment was authorised and endorsed by the company's leadership. |
| Evidence |
| <p>[1] Mitsubishi Electric Group Anti-bribery Policy (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/risks/pdf/Anti-BriberyPolicy_en.pdf [p.1]</p> <p style="text-align: center;">Mitsubishi Electric Group Anti-Bribery Policy Preamble</p> <p>In relation to dealing with public officials or any other persons in similar capacity in or outside the country, Mitsubishi Electric Group has previously established "Prohibition of Improper Payments" in "Mitsubishi Electric Group Conduct Guidelines" in an effort to strictly prohibit our group companies and their officers and employees from offering bribes, and taken various steps to prevent bribery, implementing employee education, self-inspection and conducting internal audit, etc. However, in the light of the current global situation where anti-bribery regulations are becoming increasingly tighter, we are now engaged in strengthening our anti-bribery measures even further to respond to the expansion of our business at a global level.</p> <p>Our group has established "Mitsubishi Electric Group Anti-Bribery Policy" in April 2017 to reiterate, to people in and outside the group, our policy that our group companies, their officers and employees do not offer bribes, do not pursue profits if such profits can be realized only by offering bribes, and remain firm in rejecting any illegal demand. Based on this policy, our group companies are making efforts to establish and improve necessary and appropriate internal rules and to enhance educational and auditing activities to constantly prevent offering of bribes.</p> <p>These efforts toward prevention of bribery will not bring results if made only by our group. To achieve this goal, cooperation of all of our business partners who are involved in the business of our group is essential. Your understanding of the objective of this policy and continuous support will be greatly appreciated.</p> <p style="text-align: right;">April 1, 2018</p> <div style="text-align: right;">  Takeshi Sugiyama President & CEO </div> |

| Question |
|---|
| 1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories: a) All employees, including staff and leadership of subsidiaries and other controlled entities; b) All board members, including non-executive directors. |
| Score |
| 2 |
| Comments |
| <p>There is evidence that the company publishes an anti-bribery and corruption policy, which makes specific reference to the prohibition of bribery, payments to public officials, commercial bribery, and facilitation payments. It is clear from publicly available information that this policy applies to all employees and board members.</p> |
| Evidence |
| <p>[1] Mitsubishi Electric Group Anti-bribery Policy (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/risks/pdf/Anti-BriberyPolicy_en.pdf [p.2]</p> <p style="text-align: center;">Mitsubishi Electric Group Anti-Bribery Policy</p> <p>This Mitsubishi Electric Group Anti-Bribery Policy (hereinafter referred to as the "Policy") is provided for the purpose of prohibiting each Group company and its officers and employees from offering bribes to any public official or any person who holds a similar position in or outside the country (hereinafter referred to as a "Public Official") or any private individual or corporation, and thereby promoting compliance with anti-bribery laws and regulations in or outside the country and proper business activities of the Group.</p> <p>1. Compliance with Law Each Group company, its officers, and employees shall comply with all anti-bribery laws and regulations applicable to the Group company.</p> <p>2. Prohibition of Bribery Each Group company, its officers, and employees shall not engage in Bribery in any country or region in which the Group company carries out business. Furthermore, we do not pursue profits if such profits can be realized only by offering bribes. If any demand for Bribery or any act which may constitute Bribery is made by a Public Official or a private individual or corporation, each Group company, its officers, and employees shall refuse such demand. In this Policy, "Bribery" means provision of any gift, entertainment or any other benefit (regardless of whether such benefit is a tangible or intangible benefit, and including bearing expenses, giving any donation or aid or making facilitation payment^{*1}) or promise to provide or offer to provide such benefit to any person, whether directly or indirectly and whether such person is a Public Official or a private individual or corporation, with the expectation or appearance of improperly obtaining or maintaining business or other inappropriate benefit or having such person improperly perform any act or improperly refrain from performing any act related to that person's functions or duties.</p> <p>3. Prohibition of Payment used for Bribery to Third Party No Group company, its officers, or employees shall make any payment to any agent, distributor, dealer consultant or any other third party if such payment may be used or is suspected to be used for Bribery.</p> <p>4. Retention of Records Each Group company shall follow proper accounting procedures to process and record all transactions, expense payments and disposition of assets in accordance with internal rules and procedures, and shall retain relevant records in a proper manner.</p> <p>5. Audit and Whistle-Blowing Each Group company shall implement an internal audit system, whistle-blowing system or any other appropriate system and procedures to detect any actual or attempted Bribery. Also, if any such act is discovered, each Group company shall investigate it properly, report it to the relevant authority as necessary, and take other corrective measures.</p> <p>6. Anti-Bribery Compliance by Group companies Each Group company shall implement necessary and appropriate internal rules, guidelines, systems and procedures consistent with the principles of this Policy. Further, each Group company shall ensure compliance at all times with the anti-bribery laws and regulations of each country/region in which it operates. Also, for the purpose of promoting a compliance culture and prohibiting Bribery by any Group company or its officers or employees, each Group company shall provide periodical compliance training for and take all other appropriate action necessary or appropriate within an anti-bribery compliance culture.</p> <p style="text-align: right;">Established: April 1, 2017</p> <p>^{*1} A payment in a small amount to facilitate procedures related to regular administrative services.</p> |

Question

1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?

Score

1

Comments

There is some evidence that the company has a designated board committee that oversees all compliance activities, which is understood to include the anti-bribery and corruption programme. The company's publicly available evidence indicates that the board discusses the results of activities in the previous fiscal year and responds to legal amendments.

However, the company receives a score of '1' because there is no clear evidence to suggest that it engages in formal oversight functions, such as reviewing the results of internal and external audits.

Evidence

[2] Mitsubishi Electric 2018 CSR Report (Document)

Accessed 22/07/2019

https://www.mitsubishielectric.com/sites/GWS/en/sustainability/reports/pdf/2018/CSR_report_2018.pdf

[p.11]

Promotional System for CSR

The policies and planning for the CSR activities of the Mitsubishi Electric Group are decided by a CSR Committee appointed by Mitsubishi Electric's executive officers.

The Committee is composed of the heads of Mitsubishi Electric's management departments (19 members in charge of environmental, social and governance aspects from divisions such as Corporate Strategic Planning and Corporate Human Resources), and discusses the results of activities performed during the previous fiscal year, decisions on future activity plans, and responses to law amendments, from a perspective that spans the entire Mitsubishi Electric Group.

Knowing that CSR activities are directly linked to corporate management, each department responsible for ethics and legal compliance, quality assurance and improvement, environmental conservation and philanthropy activities, and communication with stakeholders implements their own initiatives, based on the CSR policy of the Mitsubishi Electric Group.

In addition to the CSR Committee that is generally held once a year, various activities are also promoted and implemented in communication with the CSR Expert Committee and CSR Business Promotion Committee, which are convened as a forum for sharing and executing the policies and plans established by the CSR Committee.



CSR Promotion System



CSR Committee

Main agenda of the CSR Committee (held in April 2018)

- Report on achievements made in the previous fiscal year and activities planned in the current fiscal year
- Responses to the sustainable development goals (SDGs)
- Responses to ESG (environment, social, governance) investment
- Human rights initiatives
- Supply chain management

[p.12]

CSR Expert Committee

Officers from 19 departments with close ties to CSR regularly hold meetings to share information and deepen their understanding of the Mitsubishi Electric Group's CSR materiality and future initiatives, as well as discuss responses to laws and regulations and international CSR standards. They aim to build communication and consensus through these discussions.

Five such meetings were held in fiscal 2018. Discussions focused on verifying the performance and reviewing the targets of initiatives addressing CSR materiality, and discussing responses to the SDGs. The committee also examined responses to global human rights initiatives by establishing working groups for relevant departments.



CSR Expert Committee

CSR Business Promotion Committee

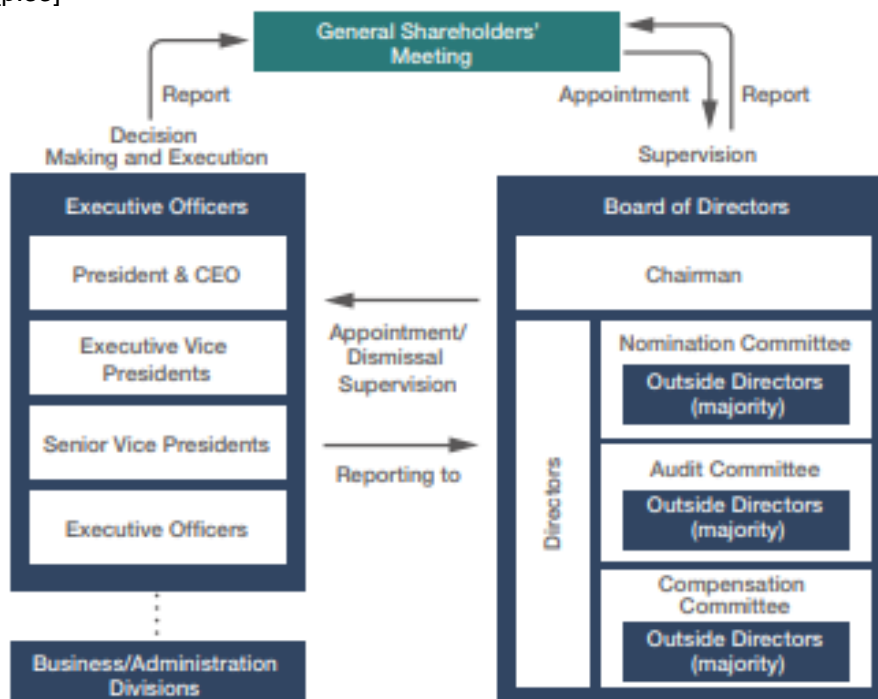
Managers from all business groups gather in regular meetings to share information about the Mitsubishi Electric Group's CSR and discuss social issues that need to be solved, with the theme of "contributing to society through business."

The committee held five meetings in fiscal 2018, with a focus on discussing how the Group could contribute to addressing the SDGs through business.



CSR Business Promotion Committee

[p.33]



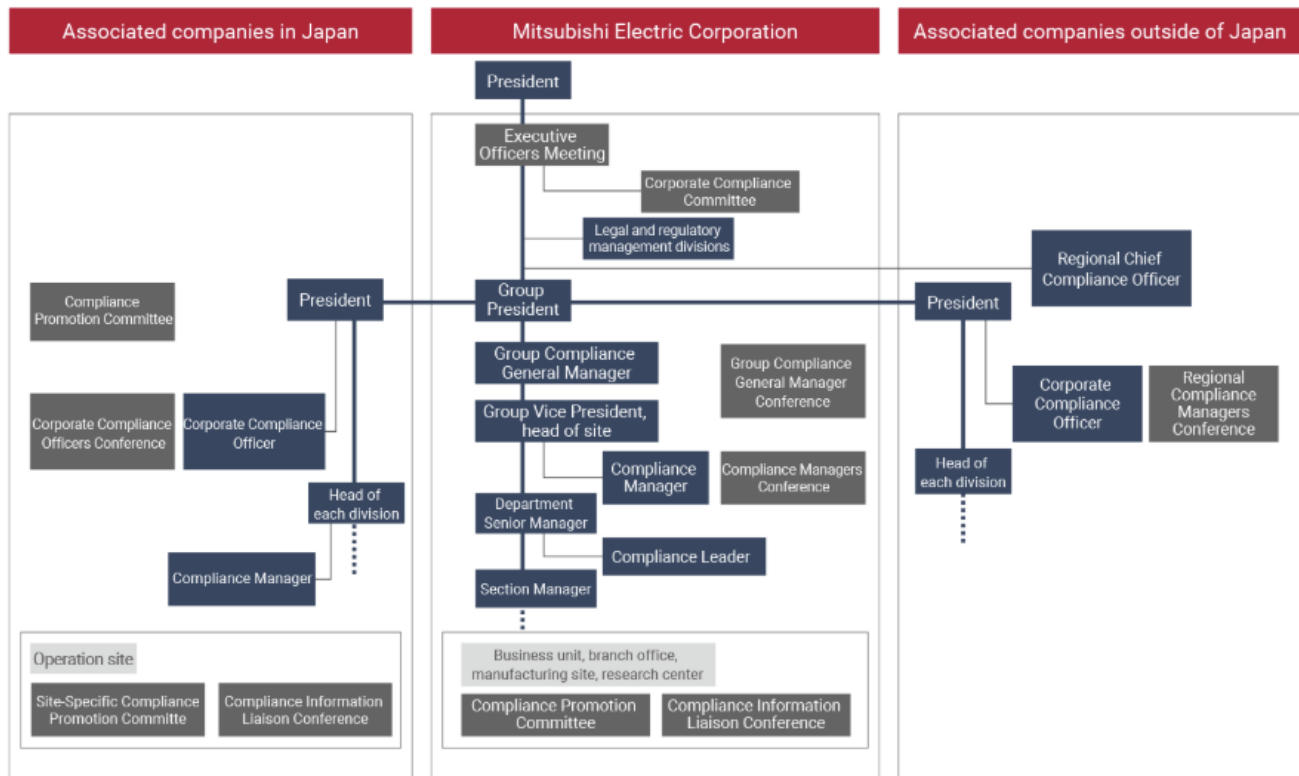
Corporate Governance Framework

[3] System to ensure thorough implementation of compliance at global level (Webpage)

Accessed 22/07/2019

<https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/structure/index.html>

Based on recognition that the promotion of compliance is inseparably linked with business promotion, the Mitsubishi Electric Group's compliance system has our business divisions and affiliates in Japan and overseas take the initiative in promoting compliance.



Question

1.4. Is responsibility for implementing and managing the company's anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company's programme?

Score

1

Comments

There is evidence that a managerial-level individual has been assigned ultimate responsibility for implementing and managing the company's anti-bribery and corruption programme, which is understood to be a part of its compliance activities.

However, the company receives a score of '1' because there is no evidence to indicate that the individual is a senior executive. In addition, there is no evidence that this individual has an explicit direct reporting line to the board committee that provides oversight of the anti-bribery and corruption programme.

Evidence**[2] Mitsubishi Electric 2018 CSR Report (Document)**

Accessed 22/07/2019

https://www.mitsubishielectric.com/sites/GWS/en/sustainability/reports/pdf/2018/CSR_report_2018.pdf

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Knowing that CSR activities are directly linked to corporate management, each department responsible for ethics and legal compliance, quality assurance and improvement, environmental conservation and philanthropy activities, and communication with stakeholders implements their own initiatives, based on the CSR policy of the Mitsubishi Electric Group.

In addition to the CSR Committee that is generally held once a year, various activities are also promoted and implemented in communication with the CSR Expert Committee and CSR Business Promotion Committee, which are convened as a forum for sharing and executing the policies and plans established by the CSR Committee.



CSR Promotion System



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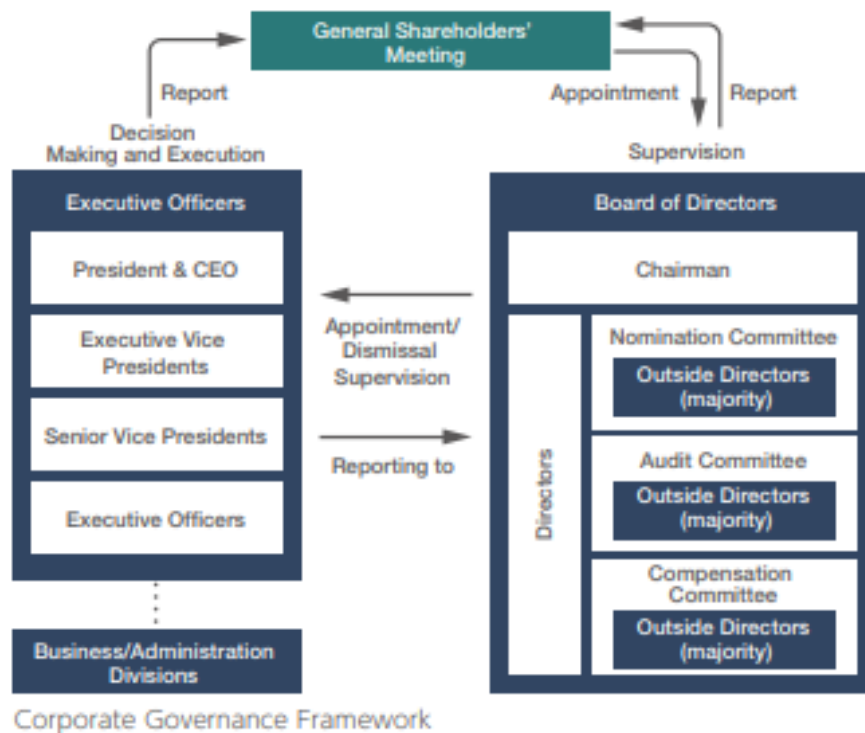
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CSR Business Promotion Committee

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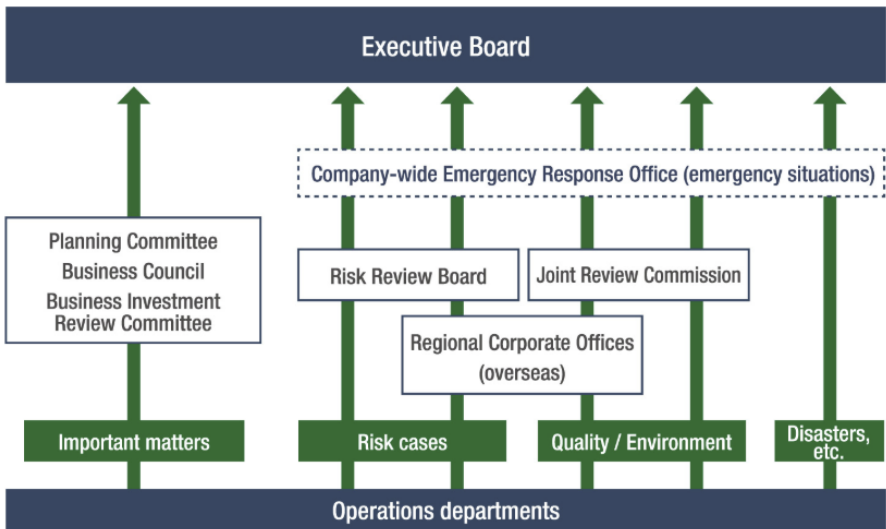
[4] Directors & Executive Officers (Webpage)

Accessed 22/07/2019

<https://www.mitsubishielectric.com/en/about/organization/management/index.page>**Executive Officers:**

| | |
|--------------------|---|
| Takashi Nishimura | In charge of Communication Systems |
| Masamitsu Okamura | In charge of Semiconductor & Device |
| Masahiro Fujita | In charge of IT and Research & Development |
| Satoshi Matsushita | In charge of Global Strategic Planning & Marketing |
| Hiroshi Onishi | In charge of Automotive Equipment |
| Yoshikazu Miyata | In charge of Factory Automation Systems |
| Tadashi Matsumoto | In charge of Living Environment & Digital Media Equipment |
| Jun Nagasawa | In charge of Advertising and Domestic Marketing |
| Shinji Harada | In charge of General Affairs, Human Resources and Public Relations |
| Tadashi Kawagoishi | In charge of Accounting and Finance |
| Takakazu Murozono | In charge of Auditing and Legal Affairs & Compliance |
| Koichi Orito | In charge of Energy & Industrial Systems |
| Juichi Shikata | In charge of Purchasing |
| Yoshihisa Hara | In charge of Electronic Systems |
| Atsuhiro Yabu | In charge of Total Productivity Management & Environmental Programs |

2. Internal Controls

| Question |
|--|
| 2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces? |
| Score |
| 0 |
| Comments |
| <p>There is no evidence that the company has a formal risk assessment procedure which is used to inform the company's anti-bribery and corruption programme. There is some evidence that the company has a risk management framework in place, but it is not clear that this includes bribery and corruption risks.</p> |
| Evidence |
| <p>[5] Basic Policy Risk Management (Webpage) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/sustainability/csr/governance/risk/policy/index.html To respond to the expectations of all stakeholders beginning with society, customers and shareholders, and to realize sustainable growth, the Group has a framework in place for managing business-related risks in an appropriate manner.</p> <p>The framework provides proper responses to risks depending on their type, size and impact. For example, by incorporating risk management into business activities, risks are managed according to the size and characteristics of each business, and important risks that cover the entire Group are mainly managed by corporate departments.</p> <p>[6] Risk Management Framework (Webpage) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/sustainability/csr/governance/risk/structure/index.html The Mitsubishi Electric Group maintains a multi-dimensional risk management system in which all executive officers participate.</p> <p>Under this system, executive officers are responsible for risk management in their assigned areas of operation. In addition, executive officers exchange information and participate in important management initiatives and decisions through regularly scheduled executive officers' meetings.</p>  <p>Risk management framework</p> |

| Question |
|---|
| 2.2. Is the company's anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations? |
| Score |
| 1 |
| Comments |
| <p>There is some evidence that the company's anti-bribery and corruption programme, as part of its compliance framework, is subject to regular review. There is also evidence that high-level audit findings are presented to the board, with clear ownership assigned to units for planned updates and improvements to the anti-bribery and corruption programme.</p> <p>However, the company receives a score of '1' because it does not clearly specify that the entire programme is audited to ensure that it is consistent with high standards of best practice and the business risks facing the company.</p> |
| Evidence |
| <p>[1] Mitsubishi Electric Group Anti-bribery Policy (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/risks/pdf/Anti-BriberyPolicy_en.pdf [p.2]</p> <p>5. Audit and Whistle-Blowing Each Group company shall implement an internal audit system, whistle-blowing system or any other appropriate system and procedures to detect any actual or attempted Bribery. Also, if any such act is discovered, each Group company shall investigate it properly, report it to the relevant authority as necessary, and take other corrective measures.</p> <p>[7] Compliance Audits (Webpage) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/audits/index.html To verify the state of compliance in the Mitsubishi Electric Group, the internal departments in each of the affiliated companies in the Group carries out self-inspection several times a year by various means. The inspection utilizes various tools, including specific check sheets for the areas of corporate ethics and legal compliance. Corrective action is taken as necessary in response to the result of such self-inspection.</p> <p>Additionally, internal regulations and systems are in place to ensure proper operations across the Mitsubishi Electric Group. The Corporate Auditing Division of Mitsubishi Electric conducts internal audits to check the operational effectiveness of these regulations and systems (in the audit areas of ethics and legal compliance, accounting and finance, human resources, technology management and quality management). If an audit reveals the need for improvement, the relevant company or department will receive instructions for remediation/improvement. Periodical reports of audit are presented before the audit committee through the executive officer in charge of internal audits.</p> <p>[8] Initiatives against major compliance risks (Webpage) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/risks/index.html Corruption Prevention (Preventing Bribery) We engage in Group-wide initiatives to prevent bribery. The "Mitsubishi Electric Group Anti-Bribery Policy" that was established on April 1, 2017 reiterates to people in and outside the Group our policy that, among other things, our Group companies, their officers and employees do not offer bribes and do not pursue profits that can be realized only by offering bribes.</p> <p>Furthermore, we are conducting monitoring activities such as maintaining and enacting internal regulations for interactions with public officials inside and outside the country as a measure to prevent bribery. In addition, we provide education to employees who regularly interact with public officials in the combined form of e-learning programs and face-to-face education (fiscal 2019: 24,056 participants).</p> <p>In the light of the current global situation where anti-bribery regulations are becoming increasingly tighter, we will continue to enhance measures in each region, and take effective and efficient measures by selecting countries and</p> |

transactions with particularly high risks of being involved in bribery, to respond to the expansion of our business at a global level.

[9] Mitsubishi Electric 2019 Annual Report (Document)

Accessed 22/07/2019

https://www.mitsubishielectric.com/en/investors/library/annual_report/pdf/ar2019.pdf

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- Status of Internal Audit

Internal audit is intended to contribute to the sound management and strengthened management structure of Mitsubishi Electric and its affiliated companies in Japan and overseas by improving management efficiency, strengthening risk management, thoroughly observing the code of corporate ethics and ensuring compliance, and enhancing internal control.

With approximately 40 members acting independently, Mitsubishi Electric's Corporate Auditing Division conducts internal audits of the Company from a fair and impartial standpoint. In addition, the division's activities are supported by auditors with extensive knowledge of their particular fields, assigned from relevant business units. Through an Executive Officer in charge of auditing, the Corporate Auditing Division regularly reports the results of such audits to the Audit Committee.

[2] Mitsubishi Electric 2018 CSR Report (Document)

Accessed 22/07/2019

https://www.mitsubishielectric.com/sites/GWS/en/sustainability/reports/pdf/2018/CSR_report_2018.pdf

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Providing Directors with Appropriate Information at the Appropriate Time, and Conducting Reviews of the Board with Analyses and Evaluations

To strengthen the Board's capacity to supervise Company's management, the bureaus of the Board of Directors and each committee provide the directors with the information necessary for supervising management, in a timely and appropriate manner. And, to further improve the Board of Directors' capacity to supervise management, venues have been established for supplying information to and exchanging views with Outside Directors, and the Company is working to further enhance the provision of management-related information to the Board of Directors itself.

Additionally, in order to further enhance the functioning of the Board of Directors, the Board meetings are reviewed on an annual basis, and analyses and evaluations are conducted in the following areas.

- Frequency, scheduling, and time spent on the meetings
- The information supplied in relation to discussions at the meetings (quality and quantity) and the method of its provision
- Materials, details and methods of explanation, question-and-answer guidelines, time apportioned for each proposal on the meetings
- Other mechanisms for improving the functioning of the Board of Directors.
- Points for improvement of policies based on previous reviews of the Board of Directors
- Opinions about and points for improvement in the method for reviewing the Board of Directors, etc.

As a result of the Board of Directors review, the Board of Directors was evaluated as making ongoing and effective improvements in response to the results of annual reviews, and achieving even better results every time with respect to sharing timely and appropriate management information with Executive Officers, which is essential for the Board to properly fulfill its business supervisory function.

This evaluation in effect endorses the performance of the Board of Directors, but going forward further efforts will be made to improve the performance of the Board of Directors by enhancing the opportunities for exchanging opinions between the supervisory side and executive side and improving the management of the Board of Directors review through conducting individual interviews regarding review results and expanding time for opinion exchange.

| Question |
|--|
| 2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels? |
| Score |
| 1 |
| Comments |
| <p>There is evidence that the company publicly commits to investigating incidents, and the company has a specific procedure in place to deal with whistleblowing cases, which stipulates documentation and actions to be taken at each step. The process covers the investigation from receipt to outcome and is held by an independent team.</p> <p>However, the company receives a score of '1' because there is no evidence that it commits to provide whistleblowers with updates on the outcome of investigations. In addition, there is no evidence that information from each investigation is documented or that summary information is reviewed by a central body.</p> |
| Evidence |
| <p>[1] Mitsubishi Electric Group Anti-bribery Policy (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/risks/pdf/Anti-BriberyPolicy_en.pdf [p.2]</p> <p>5. Audit and Whistle-Blowing</p> <p>Each Group company shall implement an internal audit system, whistle-blowing system or any other appropriate system and procedures to detect any actual or attempted Bribery. Also, if any such act is discovered, each Group company shall investigate it properly, report it to the relevant authority as necessary, and take other corrective measures.</p> <p>[9] Mitsubishi Electric 2019 Annual Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/investors/library/annual_report/pdf/ar2019.pdf [p.23]</p> <p>Internal Control System</p> <p>(1) For the execution of the duties of the Audit Committee, its independence is secured by assigning employees whose job is exclusively to assist the Audit Committee members. In addition, internal regulations regarding the processing of expenses and debts incurred in the execution of the duties of the Audit Committee members are established and such expenses and debts are properly processed.</p> <p>A system for reporting to the Audit Committee is developed to report information about the Company and its subsidiaries to the Audit Committee via the divisions in charge of internal control, and an internal whistle-blower system is developed and its details are reported to the Audit Committee members.</p> <p>Furthermore, the Audit Committee members attend important meetings including Executive Officer meetings and conduct investigations such as interviews with Executive Officer and the executives of the Company's offices and subsidiaries, and undertake deliberations to determine audit policies, methods, implementation status, and results of the audit by regularly receiving reports from the Independent Auditor and Executive Officers in charge of audits.</p> <p>(2) Internal regulations and systems to ensure the properness of operations within the Mitsubishi Electric Group are established. Executive Officers take responsibility for constructing such systems within the areas over which they are appointed. Important matters are deliberated by convening Executive Officer meetings.</p> <p>Executive Officers regularly monitor the status of management of the systems. The divisions in charge of internal control monitor the status of design</p> |

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and management of internal control system and regulations. Also an internal whistle-blower system is established and the matters reported thereto are informed to the Audit Committee members.

Furthermore, the status of management of the system is audited by internal auditors, and the audit results are reported regularly to the Audit Committee via Executive Officers in charge of audit.

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- Audit Committee

The Audit Committee is made up of five directors, three of whom are outside directors. In accordance with the policies and assignments agreed upon by the Committee, committee members- mainly those from the Audit Committee responsible for investigation- attend Executive Officers' meetings and other such important conferences, and conduct hearings and surveys of Executive Officers and the executive staff of Mitsubishi Electric offices and affiliated companies.

Divisions in charge of internal control including the Corporate Auditing Division, through a responsible Executive Officer, submit reports to the Audit Committee, which holds periodic report meetings to exchange information and discuss policies. In addition, the Audit Committee discusses policies and methods of auditing with accounting auditors, who furnish it with reports on the status and results of the audits of the Company that they themselves conduct.

Akihiro Matsuyama, Chairman of the Audit Committee, and Masahiko Sagawa, a member of the Audit Committee, have long years of experience in the accounting and financial operations of the Company. Kazunori Watanabe, a member of the Audit Committee, is a Certified Public Accountant and has a considerable degree of knowledge about finance and accounting.

[10] Establishment of internal and external ethics and legal compliance hotlines (Webpage)

Accessed 22/07/2019

<https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/hotlines/index.html>

Mitsubishi Electric has put in place "ethics and legal compliance hotlines" (internal notification system, so-called "whistle blowing system"), with the objective of promptly addressing fraudulent, illegal, and anti-ethical conducts as a self-disciplinary mechanism. This function is available through two notification channels, inside and outside the company. The outside channel is managed by independent law firms. The hotlines are operated pursuant to clearly defined internal regulations that ensure responses to anonymous informants, elimination of disadvantageous treatment of informants, and the confidentiality of all informants. Notifications are also accepted from business partners and companies, if it pertains to issues that arise out of their relationship with Mitsubishi Electric, including but not limited to business transactions.

Alleged issues of each notification are examined by a group composed "ad hoc" of members from departments capable of conducting investigation, depending on the nature of the notification. In case an alleged issue casts doubt on compliance with pertinent laws and/or internal rules, efforts are made to reinforce the prevalence of adequate norms through a revision of rules or explanatory meetings for promoting due understanding of the same. Where misconduct contrary to any laws and/or internal rules is detected, the concerned employee is subject to disciplinary action, and if any organized involvement in the detected incident is found, remediation is demanded of the concerned department.

The detailed functions of these "ethics and legal compliance hotlines" are provided in the booklet distributed to all employees for dissemination of Mitsubishi Electric Group Conduct Guidelines. These detailed functions also appear on posters displayed in each workplace (each department and operating base), on the handheld cards containing the contact information of internal and external contact points that are distributed to all employees, and on the Group website, to ensure that we communicate them to all employees.

The internal notification system is also in place in each affiliated company of the Mitsubishi Electric Group both in Japan and overseas.

Question

2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations?

Score

0

Comments

There is no evidence that the company assures itself of the quality of its internal investigations.

Evidence

[2] Mitsubishi Electric 2018 CSR Report (Document)

Accessed 22/07/2019

https://www.mitsubishielectric.com/sites/GWS/en/sustainability/reports/pdf/2018/CSR_report_2018.pdf

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Establishment of Internal and External Ethics and Legal Compliance Hotlines

Mitsubishi Electric has put in place "ethics and legal compliance hotlines" (internal notification system, so-called "whistle blowing system"), with the objective of promptly addressing fraudulent, illegal, and anti-ethical conducts as a self-disciplinary mechanism. This function is available through two notification channels, inside and outside the company. The outside channel is managed by independent law firms. The hotlines are operated pursuant to clearly defined internal regulations that ensure responses to anonymous informants, elimination of disadvantageous treatment of informants, and the confidentiality of all informants. Notifications are also accepted from business partners and companies, if it pertains to issues that arise out of their relationship with Mitsubishi Electric, including but not limited to business transactions.

Alleged issues of each notification are examined by a group composed "ad hoc" of members from departments capable of conducting investigation, depending on the nature of the notification. In case an alleged issue casts doubt on compliance with pertinent laws and/or internal rules, efforts are made to reinforce the prevalence of adequate norms through a revision of rules or explanatory meetings for promoting due understanding of the same. Where misconduct contrary to any laws and/or internal rules is detected, the concerned employee is subject to disciplinary action, and if any organized involvement in the detected incident is found, remediation is demanded of the concerned department.

The detailed functions of these "ethics and legal compliance hotlines" are provided in the booklet distributed to all employees for dissemination of Mitsubishi Electric Group Conduct Guidelines. Posters are also displayed in each workplace (each department and operational basis), as well as on the Group website, to thoroughly make known its function to all employees.

The internal notification system is also in place in each affiliated company of the Mitsubishi Electric Group both in Japan and overseas.



Poster for internal dissemination of information on the hotline

| Question |
|--|
| 2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities? |
| Score |
| 1 |
| Comments |
| <p>There is some evidence that the company commits to report material findings of bribery and corruption from investigations to the relevant authorities if necessary.</p> <p>However, the company receives a score of '1' because there is no clear evidence that an appropriate senior individual is responsible for ensuring that the disclosure of material findings to relevant authorities is evaluated and acted upon if necessary.</p> |
| Evidence |
| <p>[1] Mitsubishi Electric Group Anti-bribery Policy (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/risks/pdf/Anti-BriberyPolicy_en.pdf [p.2]</p> <p>5. Audit and Whistle-Blowing</p> <p>Each Group company shall implement an internal audit system, whistle-blowing system or any other appropriate system and procedures to detect any actual or attempted Bribery. Also, if any such act is discovered, each Group company shall investigate it properly, report it to the relevant authority as necessary, and take other corrective measures.</p> <p>[9] Mitsubishi Electric 2019 Annual Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/investors/library/annual_report/pdf/ar2019.pdf [p.23]</p> <p>Internal Control System</p> <p>(1) For the execution of the duties of the Audit Committee, its independence is secured by assigning employees whose job is exclusively to assist the Audit Committee members. In addition, internal regulations regarding the processing of expenses and debts incurred in the execution of the duties of the Audit Committee members are established and such expenses and debts are properly processed.</p> <p>A system for reporting to the Audit Committee is developed to report information about the Company and its subsidiaries to the Audit Committee via the divisions in charge of internal control, and an internal whistle-blower system is developed and its details are reported to the Audit Committee members.</p> <p>Furthermore, the Audit Committee members attend important meetings including Executive Officer meetings and conduct investigations such as interviews with Executive Officer and the executives of the Company's offices and subsidiaries, and undertake deliberations to determine audit policies, methods, implementation status, and results of the audit by regularly receiving reports from the Independent Auditor and Executive Officers in charge of audits.</p> <p>(2) Internal regulations and systems to ensure the properness of operations within the Mitsubishi Electric Group are established. Executive Officers take responsibility for constructing such systems within the areas over which they are appointed. Important matters are deliberated by convening Executive Officer meetings.</p> <p>Executive Officers regularly monitor the status of management of the systems. The divisions in charge of internal control monitor the status of design</p> |

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and management of internal control system and regulations. Also an internal whistle-blower system is established and the matters reported thereto are informed to the Audit Committee members.

Furthermore, the status of management of the system is audited by internal auditors, and the audit results are reported regularly to the Audit Committee via Executive Officers in charge of audit.

| Question |
|---|
| 2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company publishes any data on ethical or bribery and corruption investigations or disciplinary actions involving its employees. |
| Evidence |
| No evidence found. |

3. Support to Employees

| Question | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|--|--|------------|-------------|---|---------|-------|------------|-----------------------------------|--|--|---|---|--|---|---|---|--|---|--|--|--|---------------------|---|--|---|---|---|---|---|-----------------------------------|---------------------|---|--|---|---|---|---|---|--|---|---|---|--|--|--|--|---|
| 3.1. Does the company provide training on its anti-bribery and corruption programme to all employees across all divisions and geographies, and in all appropriate languages? | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Score | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Comments | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>There is evidence that the company provides training that outlines the basic principles of the anti-bribery and corruption policy. The company provides this training to all employees across all divisions and countries of operation on an annual basis.</p> <p>However, the company receives a score of '1' because it is not clear that this training is provided in all appropriate languages or if the training includes the whistleblowing options available to employees.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Evidence | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>[2] Mitsubishi Electric 2018 CSR Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/sites/GWS/en/sustainability/reports/pdf/2018/CSR_report_2018.pdf [p.26]</p> <p>FY2018 initiatives and results</p> <table> <tr> <th>Initiatives</th><th>Key performance indicators (KPI) (quantitative targets are shown in brackets)</th><th>Results</th><th>Scope</th><th>Evaluation</th></tr> <tr> <td rowspan="3">Active dialogue with stakeholders</td><td>Hold a dialogue on CSR with stakeholders more than once a year (more than once/year)</td><td>Held interviews with experts regarding CSR issues seven times; held a dialogue between experts and management officers on CSR issues</td><td rowspan="3">All Mitsubishi Electric Group companies (Japan, overseas)</td><td>○</td></tr> <tr> <td>Hold dialogues with stakeholders through the general meeting of shareholders, corporate strategy presentation meetings, business strategy presentation meetings, and IR activities in Japan and overseas</td><td>Held a general meeting of shareholders Held corporate strategy presentation meetings, financial results presentation meetings, and individual meetings with institutional investors and analysts, in addition to business strategy presentation meetings of the power devices business and FA systems business, and presentations on R&D strategies and achievements Held company information sessions for individual investors</td><td>○</td></tr> <tr> <td>Provide proper information to directors at the proper time, conduct a review of the board of directors, and analyze and evaluate the review</td><td>Provided information that directors require for the supervision of management, in a timely and proper manner, and created new forums for providing data and exchanging views with outside directors to ensure greater provision of proper and timely information to directors Conducted a review of the board of directors, with the result that the board's ongoing initiatives based on the results of the review of the board of directors and its discussions that have become more active and frank compared to before were deemed valid</td><td>○</td></tr> <tr> <td rowspan="2">Corporate management with a sound oversight function</td><td>Provide orientation training and other compliance education and training to directors and executive officers as appropriate at the proper time</td><td>Provided prior training about the roles, responsibilities and dealings of directors and executive officers to new appointees Provided compliance education to directors and executive officers after their appointment, and distributed the latest training materials</td><td>Mitsubishi Electric</td><td>○</td></tr> <tr> <td>Establish the necessary internal regulations and frameworks for ensuring the appropriateness of the Mitsubishi Electric Group's businesses, conduct an internal audit of their status of operation, and regularly report the audit result to the Audit Committee via the executive officer in charge of audits</td><td>Established internal regulations and frameworks, conducted an internal audit, and regularly reported the audit results to the Audit Committee via the executive officer in charge of audits</td><td>All Mitsubishi Electric Group companies (Japan, overseas)</td><td>○</td></tr> <tr> <td>Compliance training on a continuous basis</td><td>Maintain a 100% attendance in e-learning programs on compliance (maintain rate of 100%)</td><td>Maintained a 100% attendance rate</td><td>Mitsubishi Electric</td><td>○</td></tr> <tr> <td>Fair competition (prevention of antimonopoly violations)</td><td>Enhance measures for compliance with antimonopoly laws and competition laws</td><td>Provided practical training programs based on case studies pertaining to each business on an ongoing basis to approx. 7,000 participants Systematization of some rules concerning contacts with other companies in the same business (Aim to mitigate workload by improving efficiency, make sure the evidence is stored and avoid missing procedures, etc.)</td><td>All Mitsubishi Electric Group companies (Japan, overseas)</td><td>○</td></tr> <tr> <td>Corruption prevention (prevention of bribery)</td><td>Enhance corruption prevention measures</td><td>Established the Mitsubishi Electric Group Bribery Prevention Policy Developed regulations and guidelines that specifically aim to prevent bribery (scheduled to be distributed within the Group within the next fiscal year or later) Provided bribery prevention education (approx. 730 onsite education participants, approx. 21,800 e-learning participants)</td><td>All Mitsubishi Electric Group companies (Japan, overseas)</td><td>○</td></tr> <tr> <td>CSR procurement (environment, quality, human rights, compliance, etc.)</td><td>Promote CSR procurement and provide improvement instructions to parts of the supply chain that pose a risk (assess the number of relevant suppliers to whom instructions have been provided)</td><td>Provided improvement instructions to 26 suppliers. Verified an improvement in 26 companies Expanded the scope of target suppliers to overseas companies (carried out surveys of approx. 400 suppliers mainly in China and Thailand)</td><td>Mitsubishi Electric, Mitsubishi Electric Group companies (Japan, some overseas) supply chain</td><td>○</td></tr> </table> | | | | | Initiatives | Key performance indicators (KPI) (quantitative targets are shown in brackets) | Results | Scope | Evaluation | Active dialogue with stakeholders | Hold a dialogue on CSR with stakeholders more than once a year (more than once/year) | Held interviews with experts regarding CSR issues seven times; held a dialogue between experts and management officers on CSR issues | All Mitsubishi Electric Group companies (Japan, overseas) | ○ | Hold dialogues with stakeholders through the general meeting of shareholders, corporate strategy presentation meetings, business strategy presentation meetings, and IR activities in Japan and overseas | Held a general meeting of shareholders Held corporate strategy presentation meetings, financial results presentation meetings, and individual meetings with institutional investors and analysts, in addition to business strategy presentation meetings of the power devices business and FA systems business, and presentations on R&D strategies and achievements Held company information sessions for individual investors | ○ | Provide proper information to directors at the proper time, conduct a review of the board of directors, and analyze and evaluate the review | Provided information that directors require for the supervision of management, in a timely and proper manner, and created new forums for providing data and exchanging views with outside directors to ensure greater provision of proper and timely information to directors Conducted a review of the board of directors, with the result that the board's ongoing initiatives based on the results of the review of the board of directors and its discussions that have become more active and frank compared to before were deemed valid | ○ | Corporate management with a sound oversight function | Provide orientation training and other compliance education and training to directors and executive officers as appropriate at the proper time | Provided prior training about the roles, responsibilities and dealings of directors and executive officers to new appointees Provided compliance education to directors and executive officers after their appointment, and distributed the latest training materials | Mitsubishi Electric | ○ | Establish the necessary internal regulations and frameworks for ensuring the appropriateness of the Mitsubishi Electric Group's businesses, conduct an internal audit of their status of operation, and regularly report the audit result to the Audit Committee via the executive officer in charge of audits | Established internal regulations and frameworks, conducted an internal audit, and regularly reported the audit results to the Audit Committee via the executive officer in charge of audits | All Mitsubishi Electric Group companies (Japan, overseas) | ○ | Compliance training on a continuous basis | Maintain a 100% attendance in e-learning programs on compliance (maintain rate of 100%) | Maintained a 100% attendance rate | Mitsubishi Electric | ○ | Fair competition (prevention of antimonopoly violations) | Enhance measures for compliance with antimonopoly laws and competition laws | Provided practical training programs based on case studies pertaining to each business on an ongoing basis to approx. 7,000 participants Systematization of some rules concerning contacts with other companies in the same business (Aim to mitigate workload by improving efficiency, make sure the evidence is stored and avoid missing procedures, etc.) | All Mitsubishi Electric Group companies (Japan, overseas) | ○ | Corruption prevention (prevention of bribery) | Enhance corruption prevention measures | Established the Mitsubishi Electric Group Bribery Prevention Policy Developed regulations and guidelines that specifically aim to prevent bribery (scheduled to be distributed within the Group within the next fiscal year or later) Provided bribery prevention education (approx. 730 onsite education participants, approx. 21,800 e-learning participants) | All Mitsubishi Electric Group companies (Japan, overseas) | ○ | CSR procurement (environment, quality, human rights, compliance, etc.) | Promote CSR procurement and provide improvement instructions to parts of the supply chain that pose a risk (assess the number of relevant suppliers to whom instructions have been provided) | Provided improvement instructions to 26 suppliers. Verified an improvement in 26 companies Expanded the scope of target suppliers to overseas companies (carried out surveys of approx. 400 suppliers mainly in China and Thailand) | Mitsubishi Electric, Mitsubishi Electric Group companies (Japan, some overseas) supply chain | ○ |
| Initiatives | Key performance indicators (KPI) (quantitative targets are shown in brackets) | Results | Scope | Evaluation | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Active dialogue with stakeholders | Hold a dialogue on CSR with stakeholders more than once a year (more than once/year) | Held interviews with experts regarding CSR issues seven times; held a dialogue between experts and management officers on CSR issues | All Mitsubishi Electric Group companies (Japan, overseas) | ○ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Hold dialogues with stakeholders through the general meeting of shareholders, corporate strategy presentation meetings, business strategy presentation meetings, and IR activities in Japan and overseas | Held a general meeting of shareholders Held corporate strategy presentation meetings, financial results presentation meetings, and individual meetings with institutional investors and analysts, in addition to business strategy presentation meetings of the power devices business and FA systems business, and presentations on R&D strategies and achievements Held company information sessions for individual investors | | ○ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Provide proper information to directors at the proper time, conduct a review of the board of directors, and analyze and evaluate the review | Provided information that directors require for the supervision of management, in a timely and proper manner, and created new forums for providing data and exchanging views with outside directors to ensure greater provision of proper and timely information to directors Conducted a review of the board of directors, with the result that the board's ongoing initiatives based on the results of the review of the board of directors and its discussions that have become more active and frank compared to before were deemed valid | | ○ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Corporate management with a sound oversight function | Provide orientation training and other compliance education and training to directors and executive officers as appropriate at the proper time | Provided prior training about the roles, responsibilities and dealings of directors and executive officers to new appointees Provided compliance education to directors and executive officers after their appointment, and distributed the latest training materials | Mitsubishi Electric | ○ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Establish the necessary internal regulations and frameworks for ensuring the appropriateness of the Mitsubishi Electric Group's businesses, conduct an internal audit of their status of operation, and regularly report the audit result to the Audit Committee via the executive officer in charge of audits | Established internal regulations and frameworks, conducted an internal audit, and regularly reported the audit results to the Audit Committee via the executive officer in charge of audits | All Mitsubishi Electric Group companies (Japan, overseas) | ○ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Compliance training on a continuous basis | Maintain a 100% attendance in e-learning programs on compliance (maintain rate of 100%) | Maintained a 100% attendance rate | Mitsubishi Electric | ○ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Fair competition (prevention of antimonopoly violations) | Enhance measures for compliance with antimonopoly laws and competition laws | Provided practical training programs based on case studies pertaining to each business on an ongoing basis to approx. 7,000 participants Systematization of some rules concerning contacts with other companies in the same business (Aim to mitigate workload by improving efficiency, make sure the evidence is stored and avoid missing procedures, etc.) | All Mitsubishi Electric Group companies (Japan, overseas) | ○ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Corruption prevention (prevention of bribery) | Enhance corruption prevention measures | Established the Mitsubishi Electric Group Bribery Prevention Policy Developed regulations and guidelines that specifically aim to prevent bribery (scheduled to be distributed within the Group within the next fiscal year or later) Provided bribery prevention education (approx. 730 onsite education participants, approx. 21,800 e-learning participants) | All Mitsubishi Electric Group companies (Japan, overseas) | ○ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CSR procurement (environment, quality, human rights, compliance, etc.) | Promote CSR procurement and provide improvement instructions to parts of the supply chain that pose a risk (assess the number of relevant suppliers to whom instructions have been provided) | Provided improvement instructions to 26 suppliers. Verified an improvement in 26 companies Expanded the scope of target suppliers to overseas companies (carried out surveys of approx. 400 suppliers mainly in China and Thailand) | Mitsubishi Electric, Mitsubishi Electric Group companies (Japan, some overseas) supply chain | ○ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

FY2019 targets

| Initiatives | Key performance indicators (KPI) (quantitative targets are shown in brackets) | Scope |
|--|--|--|
| Active dialogue with stakeholders | Hold a dialogue on CSR with stakeholders more than once a year (more than once/year) | All Mitsubishi Electric Group companies (Japan, overseas) |
| Corporate management with a sound oversight function | Hold dialogues with stakeholders through the general meeting of shareholders, corporate strategy presentation meetings, financial results presentation meetings, individual meetings and other such information meetings, and IR activities in Japan and overseas | |
| | Provide proper information to directors at the proper time, conduct a review of the board of directors, and analyze and evaluate the review | Mitsubishi Electric |
| | Provide orientation training and other compliance education and training to directors and executive officers as appropriate at the proper time | |
| | Establish internal regulations and frameworks needed to ensure proper operations of the Mitsubishi Electric Group, conduct an internal audit of their operational status, and regularly report the results of the audit to the audit committee via the executive officer in charge of auditing | All Mitsubishi Electric Group companies (Japan, overseas) |
| Compliance training on a continuous basis | Provide compliance education that utilizes diverse methods, on a continuous basis | All Mitsubishi Electric Group companies (Japan, overseas) |
| | Maintain a 100% attendance in e-learning programs on compliance (maintain rate of 100%) | Mitsubishi Electric |
| Fair competition (prevention of antimonopoly violations) | Provide practical training in reference to case studies that reflect the characteristics of each business, on a continuous basis | |
| | Identify issues that accompany the systematization of rules concerning contacts with other companies in the same business and enhance the operation of the system | All Mitsubishi Electric Group companies (Japan, overseas) |
| | Strengthen responses to vertical restraints and regulations of antimonopoly laws | |
| Corruption prevention (prevention of bribery) | Enhance bribery prevention measures: provide bribery prevention education (onsite education, e-learning programs), conduct monitoring with an eye to the establishment of regulations and guidelines | All Mitsubishi Electric Group companies (Japan, overseas) |
| CSR procurement (environment, quality, human rights, compliance, etc.) | Formulate CSR procurement guidelines, and obtain a compliance agreement from suppliers targeted for the FY2019 survey (100%) | Mitsubishi Electric, Mitsubishi Electric Group companies (Japan, some overseas) supply chain |
| | Expand the scope of the survey of overseas suppliers to Europe and the U.S. | |

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Continually Strengthening Compliance

The Mitsubishi Electric Group abides by the Corporate Ethics and Compliance Statement formulated in 2001 as its basic guideline for compliance, and recognizes the importance of ethics and legal compliance as a fundamental precondition for the Group's continued existence.

Based on this awareness, efforts are directed at strengthening the compliance system, maintenance of facilities, and employee education program, to broadly promote compliance that not only encompasses legal compliance, but also includes the perspective of corporate ethics.

In particular, the Mitsubishi Electric Group treats preventing the violation of anti-trust laws and corruption prevention (preventing bribery) as important issues. We have established a set of internal company regulations, strengthened education and awareness, and are in the process of working on other prevention initiatives. Reflecting on mistakes made in the past, we are establishing rules for contacting companies in our industry, holding continual training divided by level and business headquarters, and engaging in other measures keep the prevention of antitrust violations clear in people's minds and prevent recurrences. For the prevention of bribery, we have enacted the Mitsubishi Electric Group Anti-Bribery Policy in April 2017 and spread it both inside and outside the company, as well as built internal policies for dealing with public officials and other figures, held e-learning geared toward bribery prevention and interview-based practical training with case studies included, and taken other measures to strengthen our policies.

We have also distributed the Mitsubishi Electric Group Standard for Ethics and Regulatory Compliance, a summary of our company's

principal approach to compliance, to all employees and are holding continual training related to the standard.

Various learning programs on laws and regulations related to procurement are also provided to employees in charge of procurement activities as one aspect of supply chain management. In Japan, a course on material procurement laws provides guidance and education on the Anti-Monopoly Act, the Act against Delay in Payment of Subcontract Proceeds, Etc. to Subcontractors, the Construction Contractors Law, and our systems of internal checks and balances. In overseas offices, compliance education related to procurement is provided to ensure no employee becomes involved in bribery, embezzlement, or anything else that goes against the principle of fair trade. In addition to the above, CSR education based on CSR Procurement Guidelines is also provided to employees in procurement departments to further strengthen CSR initiatives along the supply chain.



Working-level conference on compliance in the China region



Meeting of compliance managers in the Asia region

[1] Mitsubishi Electric Group Anti-bribery Policy (Document)

Accessed 22/07/2019

https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/risks/pdf/Anti-BriberyPolicy_en.pdf

[p.2]

6. Anti-Bribery Compliance by Group companies

Each Group company shall implement necessary and appropriate internal rules, guidelines, systems and procedures consistent with the principles of this Policy. Further, each Group company shall ensure compliance at all times with the anti-bribery laws and regulations of each country/region in which it operates. Also, for the purpose of promoting a compliance culture and prohibiting Bribery by any Group company or its officers or employees, each Group company shall provide periodical compliance training for and take all other appropriate action necessary or appropriate within an anti-bribery compliance culture.

[9] Mitsubishi Electric 2019 Annual Report (Document)

Accessed 22/07/2019

https://www.mitsubishielectric.com/en/investors/library/annual_report/pdf/ar2019.pdf

[p.4]

**Compliance training on a continuous basis**

We provide compliance education that utilizes diverse methods, on a continuous basis.

Mitsubishi Electric's e-learning programs on compliance

Results: FY2019

Maintained a **100%** attendance rate

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CSR Management
 **Principles of CSR**

The Mitsubishi Electric Group regards its corporate social responsibility (CSR) initiatives as the foundation of its corporate management, and upholds its Corporate Mission and Seven Guiding Principles as the basic policies of its CSR. Particularly with respect to initiatives related to ethics and legal compliance, Group-wide efforts are made to enforce measures such as enhancing training and strengthening internal controls. Active measures are also taken to ensure and improve quality assurance, environmental preservation activities, philanthropic activities, and communication with stakeholders.

[11] Thorough dissemination/education of our compliance policy (Webpage)

Accessed 22/07/2019

<https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/education/index.html>

Ensuring that Employees are Familiar with Our Compliance Policy

The top management of the Mitsubishi Electric Group, including the President, takes every opportunity to directly address employees on the subject of compliance in a diverse range of situations, ensuring that an awareness of the importance of compliance and our stance on it takes root throughout our organization.

To raise awareness even further, we also display posters of the Mitsubishi Electric Group Corporate Ethics and Compliance Statement in our workplaces and distribute cards printed with the Statement to each of our employees.

We distribute the "Mitsubishi Electric Group Conduct Guidelines" to all Mitsubishi Electric Group employees, including overseas employees. Employees in Japan receive a booklet containing the conduct guidelines, which summarizes points that employees should be aware of in relation to compliance as they conduct their work duties.

| Question | | | | |
|---|--|--|--|------------|
| 3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees: a) Employees in high risk positions, b) Middle management, c) Board members. | | | | |
| Score | | | | |
| 0 | | | | |
| Comments | | | | |
| <p>There is no evidence that the company tailors its anti-bribery and corruption training to employees based on an assessment of their role and exposure to corruption risk. The company's CSR report indicates that senior managers and directors receive specialised training for their roles, but it is not clear that this includes anti-bribery and corruption principles.</p> | | | | |
| Evidence | | | | |
| [2] Mitsubishi Electric 2018 CSR Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/sites/GWS/en/sustainability/reports/pdf/2018/CSR_report_2018.pdf | | | | |
| FY2018 initiatives and results | | | | |
| Initiatives | Key performance indicators (KPI) (quantitative targets are shown in brackets) | Results | Scope | Evaluation |
| Active dialogue with stakeholders | Hold a dialogue on CSR with stakeholders more than once a year (more than once/year) | Held interviews with experts regarding CSR issues seven times; held a dialogue between experts and management officers on CSR issues | All Mitsubishi Electric Group companies (Japan, overseas) | ○ |
| | Hold dialogues with stakeholders through the general meeting of shareholders, corporate strategy presentation meetings, business strategy presentation meetings, and IR activities in Japan and overseas | Held a general meeting of shareholders Held corporate strategy presentation meetings, financial results presentation meetings, and individual meetings with institutional investors and analysts, in addition to business strategy presentation meetings of the power devices business and FA systems business, and presentations on R&D strategies and achievements Held company information sessions for individual investors | | ○ |
| | | | | |
| Corporate management with a sound oversight function | Provide proper information to directors at the proper time, conduct a review of the board of directors, and analyze and evaluate the review | Provided information that directors require for the supervision of management, in a timely and proper manner, and created new forums for providing data and exchanging views with outside directors to ensure greater provision of proper and timely information to directors Conducted a review of the board of directors, with the result that the board's ongoing initiatives based on the results of the review of the board of directors and its discussions that have become more active and frank compared to before were deemed valid | Mitsubishi Electric | ○ |
| | Provide orientation training and other compliance education and training to directors and executive officers as appropriate at the proper time | Provided prior training about the roles, responsibilities and dealings of directors and executive officers to new appointees Provided compliance education to directors and executive officers after their appointment, and distributed the latest training materials | | ○ |
| | Establish the necessary internal regulations and frameworks for ensuring the appropriateness of the Mitsubishi Electric Group's businesses, conduct an internal audit of their status of operation, and regularly report the audit result to the Audit Committee via the executive officer in charge of audits | Established internal regulations and frameworks, conducted an internal audit, and regularly reported the audit results to the Audit Committee via the executive officer in charge of audits | | ○ |
| Compliance training on a continuous basis | Maintain a 100% attendance in e-learning programs on compliance (maintain rate of 100%) | Maintained a 100% attendance rate | Mitsubishi Electric | ○ |
| Fair competition (prevention of antimonopoly violations) | Enhance measures for compliance with antimonopoly laws and competition laws | Provided practical training programs based on case studies pertaining to each business on an ongoing basis to approx. 7,000 participants Systematization of some rules concerning contacts with other companies in the same business (Aim to mitigate workload by improving efficiency, make sure the evidence is stored and avoid missing procedures, etc.) | All Mitsubishi Electric Group companies (Japan, overseas) | ○ |
| Corruption prevention (prevention of bribery) | Enhance corruption prevention measures | Established the Mitsubishi Electric Group Bribery Prevention Policy Developed regulations and guidelines that specifically aim to prevent bribery (scheduled to be distributed within the Group within the next fiscal year or later) Provided bribery prevention education (approx. 730 onsite education participants, approx. 21,800 e-learning participants) | All Mitsubishi Electric Group companies (Japan, overseas) | ○ |
| CSR procurement (environment, quality, human rights, compliance, etc.) | Promote CSR procurement and provide improvement instructions to parts of the supply chain that pose a risk (assess the number of relevant suppliers to whom instructions have been provided) | Provided improvement instructions to 26 suppliers. Verified an improvement in 26 companies Expanded the scope of target suppliers to overseas companies (carried out surveys of approx. 400 suppliers mainly in China and Thailand) | Mitsubishi Electric, Mitsubishi Electric Group companies (Japan, some overseas) supply chain | ○ |

[11] Thorough dissemination/education of our compliance policy (Webpage)

Accessed 22/07/2019

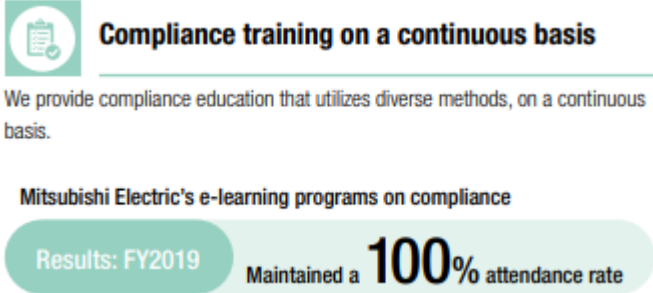
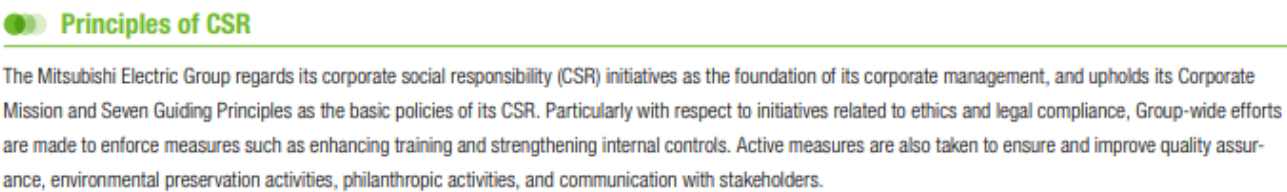
<https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/education/index.html>

Ensuring that Employees are Familiar with Our Compliance Policy

The top management of the Mitsubishi Electric Group, including the President, takes every opportunity to directly address employees on the subject of compliance in a diverse range of situations, ensuring that an awareness of the importance of compliance and our stance on it takes root throughout our organization.

To raise awareness even further, we also display posters of the Mitsubishi Electric Group Corporate Ethics and Compliance Statement in our workplaces and distribute cards printed with the Statement to each of our employees.

We distribute the "Mitsubishi Electric Group Conduct Guidelines" to all Mitsubishi Electric Group employees, including overseas employees. Employees in Japan receive a booklet containing the conduct guidelines, which summarizes points that employees should be aware of in relation to compliance as they conduct their work duties.

| Question | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|---|-------------|---|-------|-----------------------------------|--|---|---|--|---|---------------------|--|---|--|---|---|---|---|---------------------|--|--|---|---|--|---|--|---|--|--|---|---|
| 3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme? | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Score | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Comments | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>There is some evidence that the company reviews its anti-bribery and corruption communications and personnel training programme.</p> <p>However, the company receives a score of '1' because the measures are limited to the number of personnel trained and completion rates. There is also no evidence that results are used to update specific parts of the company's anti-bribery and corruption – or compliance – communications and training programme.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Evidence | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>[9] Mitsubishi Electric 2019 Annual Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/investors/library/annual_report/pdf/ar2019.pdf <p>[p.4]</p>  <p>[p.21]</p>  <p>[2] Mitsubishi Electric 2018 CSR Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/sites/GWS/en/sustainability/reports/pdf/2018/CSR_report_2018.pdf</p> <p>FY2019 targets</p> <table border="1"> <thead> <tr> <th>Initiatives</th><th>Key performance indicators (KPI) (quantitative targets are shown in brackets)</th><th>Scope</th></tr> </thead> <tbody> <tr> <td rowspan="2">Active dialogue with stakeholders</td><td>Hold a dialogue on CSR with stakeholders more than once a year (more than once/year)</td><td rowspan="2">All Mitsubishi Electric Group companies (Japan, overseas)</td></tr> <tr> <td>Hold dialogues with stakeholders through the general meeting of shareholders, corporate strategy presentation meetings, financial results presentation meetings, individual meetings and other such information meetings, and IR activities in Japan and overseas</td></tr> <tr> <td rowspan="3">Corporate management with a sound oversight function</td><td>Provide proper information to directors at the proper time, conduct a review of the board of directors, and analyze and evaluate the review</td><td>Mitsubishi Electric</td></tr> <tr> <td>Provide orientation training and other compliance education and training to directors and executive officers as appropriate at the proper time</td><td rowspan="2">All Mitsubishi Electric Group companies (Japan, overseas)</td></tr> <tr> <td>Establish internal regulations and frameworks needed to ensure proper operations of the Mitsubishi Electric Group, conduct an internal audit of their operational status, and regularly report the results of the audit to the audit committee via the executive officer in charge of auditing</td></tr> <tr> <td rowspan="2">Compliance training on a continuous basis</td><td>Provide compliance education that utilizes diverse methods, on a continuous basis</td><td>All Mitsubishi Electric Group companies (Japan, overseas)</td></tr> <tr> <td>Maintain a 100% attendance in e-learning programs on compliance (maintain rate of 100%)</td><td>Mitsubishi Electric</td></tr> <tr> <td rowspan="3">Fair competition (prevention of antimonopoly violations)</td><td>Provide practical training in reference to case studies that reflect the characteristics of each business, on a continuous basis</td><td rowspan="3">All Mitsubishi Electric Group companies (Japan, overseas)</td></tr> <tr> <td>Identify issues that accompany the systematization of rules concerning contacts with other companies in the same business and enhance the operation of the system</td></tr> <tr> <td>Strengthen responses to vertical restraints and regulations of antimonopoly laws</td></tr> <tr> <td>Corruption prevention (prevention of bribery)</td><td>Enhance bribery prevention measures: provide bribery prevention education (onsite education, e-learning programs), conduct monitoring with an eye to the establishment of regulations and guidelines</td><td>All Mitsubishi Electric Group companies (Japan, overseas)</td></tr> <tr> <td rowspan="2">CSR procurement (environment, quality, human rights, compliance, etc.)</td><td>Formulate CSR procurement guidelines, and obtain a compliance agreement from suppliers targeted for the FY2019 survey (100%)</td><td rowspan="2">Mitsubishi Electric, Mitsubishi Electric Group companies (Japan, overseas) supply chain</td></tr> <tr> <td>Expand the scope of the survey of overseas suppliers to Europe and the U.S.</td></tr> </tbody> </table> </p> | | | Initiatives | Key performance indicators (KPI) (quantitative targets are shown in brackets) | Scope | Active dialogue with stakeholders | Hold a dialogue on CSR with stakeholders more than once a year (more than once/year) | All Mitsubishi Electric Group companies (Japan, overseas) | Hold dialogues with stakeholders through the general meeting of shareholders, corporate strategy presentation meetings, financial results presentation meetings, individual meetings and other such information meetings, and IR activities in Japan and overseas | Corporate management with a sound oversight function | Provide proper information to directors at the proper time, conduct a review of the board of directors, and analyze and evaluate the review | Mitsubishi Electric | Provide orientation training and other compliance education and training to directors and executive officers as appropriate at the proper time | All Mitsubishi Electric Group companies (Japan, overseas) | Establish internal regulations and frameworks needed to ensure proper operations of the Mitsubishi Electric Group, conduct an internal audit of their operational status, and regularly report the results of the audit to the audit committee via the executive officer in charge of auditing | Compliance training on a continuous basis | Provide compliance education that utilizes diverse methods, on a continuous basis | All Mitsubishi Electric Group companies (Japan, overseas) | Maintain a 100% attendance in e-learning programs on compliance (maintain rate of 100%) | Mitsubishi Electric | Fair competition (prevention of antimonopoly violations) | Provide practical training in reference to case studies that reflect the characteristics of each business, on a continuous basis | All Mitsubishi Electric Group companies (Japan, overseas) | Identify issues that accompany the systematization of rules concerning contacts with other companies in the same business and enhance the operation of the system | Strengthen responses to vertical restraints and regulations of antimonopoly laws | Corruption prevention (prevention of bribery) | Enhance bribery prevention measures: provide bribery prevention education (onsite education, e-learning programs), conduct monitoring with an eye to the establishment of regulations and guidelines | All Mitsubishi Electric Group companies (Japan, overseas) | CSR procurement (environment, quality, human rights, compliance, etc.) | Formulate CSR procurement guidelines, and obtain a compliance agreement from suppliers targeted for the FY2019 survey (100%) | Mitsubishi Electric, Mitsubishi Electric Group companies (Japan, overseas) supply chain | Expand the scope of the survey of overseas suppliers to Europe and the U.S. |
| Initiatives | Key performance indicators (KPI) (quantitative targets are shown in brackets) | Scope | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Active dialogue with stakeholders | Hold a dialogue on CSR with stakeholders more than once a year (more than once/year) | All Mitsubishi Electric Group companies (Japan, overseas) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Hold dialogues with stakeholders through the general meeting of shareholders, corporate strategy presentation meetings, financial results presentation meetings, individual meetings and other such information meetings, and IR activities in Japan and overseas | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Corporate management with a sound oversight function | Provide proper information to directors at the proper time, conduct a review of the board of directors, and analyze and evaluate the review | Mitsubishi Electric | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Provide orientation training and other compliance education and training to directors and executive officers as appropriate at the proper time | All Mitsubishi Electric Group companies (Japan, overseas) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Establish internal regulations and frameworks needed to ensure proper operations of the Mitsubishi Electric Group, conduct an internal audit of their operational status, and regularly report the results of the audit to the audit committee via the executive officer in charge of auditing | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Compliance training on a continuous basis | Provide compliance education that utilizes diverse methods, on a continuous basis | All Mitsubishi Electric Group companies (Japan, overseas) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Maintain a 100% attendance in e-learning programs on compliance (maintain rate of 100%) | Mitsubishi Electric | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Fair competition (prevention of antimonopoly violations) | Provide practical training in reference to case studies that reflect the characteristics of each business, on a continuous basis | All Mitsubishi Electric Group companies (Japan, overseas) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Identify issues that accompany the systematization of rules concerning contacts with other companies in the same business and enhance the operation of the system | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Strengthen responses to vertical restraints and regulations of antimonopoly laws | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Corruption prevention (prevention of bribery) | Enhance bribery prevention measures: provide bribery prevention education (onsite education, e-learning programs), conduct monitoring with an eye to the establishment of regulations and guidelines | All Mitsubishi Electric Group companies (Japan, overseas) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CSR procurement (environment, quality, human rights, compliance, etc.) | Formulate CSR procurement guidelines, and obtain a compliance agreement from suppliers targeted for the FY2019 survey (100%) | Mitsubishi Electric, Mitsubishi Electric Group companies (Japan, overseas) supply chain | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Expand the scope of the survey of overseas suppliers to Europe and the U.S. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Question |
|---|
| 3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company's incentive schemes incorporate ethical or anti-bribery and corruption principles. |
| Evidence |
| <p>[2] Mitsubishi Electric 2018 CSR Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/sites/GWS/en/sustainability/reports/pdf/2018/CSR_report_2018.pdf [p.101]</p> <p>Compensation System Based on Individual Job Descriptions and Performance</p> <p>In Japan, Mitsubishi Electric has adopted a compensation system with a view to developing a corporate culture in which employees each recognize organizational targets as well as their own roles, work to raise their own value, and take on the challenge of difficult goals.</p> <p>Under this compensation system, employee performance is emphasized, with appropriate assessment given to employees who contribute substantially to management and participate actively in it. Bonuses are awarded for outstanding service. In order to increase understanding of employees about the operation of the system, we fully disclose its evaluation methods and standards, conduct surveys on the functioning of the system to gauge employee opinion on it, provide a system for handling complaints, and otherwise work to increase understanding and acceptance by employees and further enhance operations.</p> <p>We are committed to making the system function effectively by organically combining and harmonizing the three components of the system, evaluation/compensation, capacity development, and effective</p> <p>workforce utilization, in order to provide opportunities for employees to develop their own skills and advance their careers.</p>  <p>The diagram illustrates the '3-in-1 system' as an organic combination of three components through management enhancements. The components are represented by blue circles: 'Evaluation/Compensation' (top) with subtext 'Remuneration/Status', 'Capacity development' (bottom right) with subtext 'Specializing (by personal initiative + company support)', and 'Effective Workforce Utilization' (bottom left) with subtext 'Acquisition of roles/opportunities'. Arrows connect the circles in a clockwise cycle: from Evaluation/Compensation to Capacity development (labeled 'New challenges'), from Capacity development to Effective Workforce Utilization (labeled 'Realization of one's potential'), and from Effective Workforce Utilization back to Evaluation/Compensation (labeled 'Results assessment'). The central text '3-in-1 system' is in red, and the bottom caption reads 'Organic combination of components through management enhancements'.</p> |
| <p>[2] Mitsubishi Electric 2018 CSR Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/sites/GWS/en/sustainability/reports/pdf/2018/CSR_report_2018.pdf [p.45]</p> <p>Policies regarding decisions on compensation, etc.</p> <p>Compensation scheme for Directors and Executive Officers</p> <p>Policies regarding decisions on compensation, etc. will be made through resolutions by the Compensation Committee, the majority of which consists of Outside Directors. A summary of the policies is as follows.</p> <p>Compensation scheme for Directors</p> <ol style="list-style-type: none"> 1. Directors give advice to and supervise the Company's management from an objective point of view, and therefore, the compensation scheme for Directors is the payment of fixed-amount compensation and the retirement benefit upon resignation. 2. Directors will receive their compensation as a fixed amount, and the compensation to be paid will be set at a level considered reasonable, while taking into 3. account the contents of the Directors' duties and the Company's conditions, etc. Directors will receive the retirement benefit upon their resignation, and the retirement benefit to be paid will be set at a level decided on the basis of the monthly amount of compensation and the number of service years, etc. |

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Compensation scheme for Executive Officers

1. The compensation scheme for the Executive Officers focuses on incentives for the realization of management policies and the improvement of business performance, and performance-based compensation will be paid in addition to the payment of fixed-amount compensation and the retirement benefit upon resignation.
2. Fixed-amount compensation will be set at a level considered reasonable taking into account the contents of the Executive Officers duties and the Company's conditions.
3. The level of performance-based compensation will be decided while taking into account the consolidated business performance and the performance of the business to which the respective Executive Officer is assigned, etc. With the purposes of meshing the interest of shareholders with the Executive Officers and further raising management awareness that places importance on the interest of shareholders, and increasing the incentives for the improvement of business performance from the mid- and long-term perspectives, 50% of performance-based compensation will be paid in the form of shares. The Company sets a rule that, when the Executive Officers acquire the Company shares as a part of compensation, they are required to continue the shareholding until 1 year has passed from resignation.
4. The amount of the retirement benefit will be decided on the basis of the monthly amount of compensation and the number of service years, etc.

 Annual securities report (Japanese only)

[9] Mitsubishi Electric 2019 Annual Report (Document)

Accessed 22/07/2019

https://www.mitsubishielectric.com/en/investors/library/annual_report/pdf/ar2019.pdf

[p.24]

Policies Regarding Decisions on Compensation, etc.

1. Basic Policies

- (1) As a Company with Three-Committee System, the Company has separate functions for the supervision and execution of business, with the Board of Directors undertaking the business supervisory function, and Executive Officers, the business execution function. Accordingly, Directors and Executive Officers have separate compensation schemes according to the content and responsibilities of their duties.
- (2) Directors give advice to and supervise the Company's management from an objective point of view, and therefore, the compensation scheme for Directors is the payment of fixed-amount compensation and the payment of a retirement benefit upon resignation.
- (3) The compensation scheme for the Executive Officers focuses on incentives for the realization of management policies and the improvement of business performance, and performance-based compensation will be paid in addition to the payment of fixed-amount compensation and a retirement benefit upon resignation. The basic policies of such performance-based compensation are as follows:
 - 1) Compensation for the improvement of business performance over the mid- to long-term, and that increases awareness regarding contributing to increased corporate value
 - 2) Compensation that is closely linked to the Company's performance and highly transparent and objective
 - 3) Compensation focused on sharing profits with shareholders and increasing awareness of management that gives weight to shareholder benefits
- (4) In order to introduce an objective perspective from outside the Company and expert knowledge about the Directors' and Executive Officers' compensation scheme, the Company will hire an external remuneration consultant, and with the support of the consultant it will consider the compensation levels and compensation schemes by taking into account external data on the compensation of major companies in Japan operating globally, domestic economic environment, industry trends, and the Company's conditions, etc.

2. Compensation Scheme for Directors and Executive Officers and Policies Regarding Decisions on Compensation, etc.

- (1) Compensation scheme for Directors
 - 1) Directors will receive their compensation as a fixed amount, and the compensation to be paid will be set at a level considered reasonable, while taking into account the contents of the Directors' duties and the Company's conditions, etc.
 - 2) Directors will receive the retirement benefit upon resignation, and the retire-

[p.25]

ment benefit to be paid will be set at a level decided on the basis of the monthly amount of compensation and the number of service years, etc.

(2) Compensation scheme for Executive Officers

1) Fixed-amount compensation will be set at a level considered reasonable taking into account the contents of the Executive Officers' duties and the Company's conditions, etc.

2) Performance-based compensation will be as follows:

- The Mitsubishi Electric Group has been pursuing sustainable growth by maintaining Balanced Corporate Management based on three perspectives: growth, profitability and efficiency, and soundness. In line with its efforts to further increase corporate value, the Group has set its growth targets for fiscal 2021 as consolidated net sales of ¥5.0 trillion or more, and an operating income ratio of 8% or more. The payment base amount for performance-based compensation will be determined based on the consolidated business performance (Net profit attributable to Mitsubishi Electric Corp. stockholders) while taking into account the Group's management policy and targets.
- The payment amount of each Executive Officer will be determined, within the range of ±20% of the payment base amount while taking into account the performance of the business to which the respective Executive Officer is assigned, etc.
- With the purposes of meshing the interests of shareholders with the Executive Officers and further raising management awareness that places importance on the interest of shareholders, and increasing the incentives for the improvement of business performance from the mid- and long-term perspectives, 50% of performance-based compensation will be paid in the form of shares. The Company sets a rule that, for the compensation paid in the form of shares, the Company shares will be issued after a three-year waiting period. In addition, The shares are required to continue holding the shares until 1 year has passed from resignation.

3) The amount of the retirement benefit will be decided on the basis of the monthly amount of compensation and the number of service years, etc.

(3) Decision-making process, etc.

Policies regarding decisions on compensation, etc. of Directors and Executive Officers and individual compensation details based on the policies will be made through resolutions by the Compensation Committee, which the majority of the members are Outside Directors. The details of activities of the Compensation Committee will be reported to the Board of Directors each time an activity is performed.



* For the amount of compensation given to Directors and Executive Officers, please refer to our financial statements. (Only in Japanese)
http://www.MitsubishiElectric.co.jp/ir/data/negotiable_securities/

| Question |
|---|
| 3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company commits to support or protect employees who refuse to act unethically. |
| Evidence |
| No evidence found. |

| Question |
|---|
| 3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents? |
| Score |
| 0 |
| Comments |
| There is no clear evidence that the company promotes a policy of non-retaliation against whistleblowers or employees who report bribery and corruption incidents. |
| Evidence |
| <p>[1] Mitsubishi Electric Group Anti-bribery Policy (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/risks/pdf/Anti-BriberyPolicy_en.pdf [p.2]</p> <p>5. Audit and Whistle-Blowing</p> <p>Each Group company shall implement an internal audit system, whistle-blowing system or any other appropriate system and procedures to detect any actual or attempted Bribery. Also, if any such act is discovered, each Group company shall investigate it properly, report it to the relevant authority as necessary, and take other corrective measures.</p> <p>[9] Mitsubishi Electric 2019 Annual Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/investors/library/annual_report/pdf/ar2019.pdf [p.23]</p> <p>Internal Control System</p> <p>(1) For the execution of the duties of the Audit Committee, its independence is secured by assigning employees whose job is exclusively to assist the Audit Committee members. In addition, internal regulations regarding the processing of expenses and debts incurred in the execution of the duties of the Audit Committee members are established and such expenses and debts are properly processed.</p> <p>A system for reporting to the Audit Committee is developed to report information about the Company and its subsidiaries to the Audit Committee via the divisions in charge of internal control, and an internal whistle-blower system is developed and its details are reported to the Audit Committee members.</p> <p>Furthermore, the Audit Committee members attend important meetings including Executive Officer meetings and conduct investigations such as interviews with Executive Officer and the executives of the Company's offices and subsidiaries, and undertake deliberations to determine audit policies, methods, implementation status, and results of the audit by regularly receiving reports from the Independent Auditor and Executive Officers in charge of audits.</p> <p>(2) Internal regulations and systems to ensure the properness of operations within the Mitsubishi Electric Group are established. Executive Officers take responsibility for constructing such systems within the areas over which they are appointed. Important matters are deliberated by convening Executive Officer meetings.</p> <p>Executive Officers regularly monitor the status of management of the systems. The divisions in charge of internal control monitor the status of design</p> <p>[p.24]</p> <p>and management of internal control system and regulations. Also an internal whistle-blower system is established and the matters reported thereto are informed to the Audit Committee members.</p> <p>Furthermore, the status of management of the system is audited by internal auditors, and the audit results are reported regularly to the Audit Committee via Executive Officers in charge of audit.</p> <p>[p.24]</p> |

- Audit Committee

The Audit Committee is made up of five directors, three of whom are outside directors. In accordance with the policies and assignments agreed upon by the Committee, committee members- mainly those from the Audit Committee responsible for investigation- attend Executive Officers' meetings and other such important conferences, and conduct hearings and surveys of Executive Officers and the executive staff of Mitsubishi Electric offices and affiliated companies.

Divisions in charge of internal control including the Corporate Auditing Division, through a responsible Executive Officer, submit reports to the Audit Committee, which holds periodic report meetings to exchange information and discuss policies. In addition, the Audit Committee discusses policies and methods of auditing with accounting auditors, who furnish it with reports on the status and results of the audits of the Company that they themselves conduct.

Akihiro Matsuyama, Chairman of the Audit Committee, and Masahiko Sagawa, a member of the Audit Committee, have long years of experience in the accounting and financial operations of the Company. Kazunori Watanabe, a member of the Audit Committee, is a Certified Public Accountant and has a considerable degree of knowledge about finance and accounting.

[10] Establishment of internal and external ethics and legal compliance hotlines (Webpage)

Accessed 22/07/2019

<https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/hotlines/index.html>

Mitsubishi Electric has put in place "ethics and legal compliance hotlines" (internal notification system, so-called "whistle blowing system"), with the objective of promptly addressing fraudulent, illegal, and anti-ethical conducts as a self-disciplinary mechanism. This function is available through two notification channels, inside and outside the company. The outside channel is managed by independent law firms. The hotlines are operated pursuant to clearly defined internal regulations that ensure responses to anonymous informants, elimination of disadvantageous treatment of informants, and the confidentiality of all informants. Notifications are also accepted from business partners and companies, if it pertains to issues that arise out of their relationship with Mitsubishi Electric, including but not limited to business transactions.

Alleged issues of each notification are examined by a group composed "ad hoc" of members from departments capable of conducting investigation, depending on the nature of the notification. In case an alleged issue casts doubt on compliance with pertinent laws and/or internal rules, efforts are made to reinforce the prevalence of adequate norms through a revision of rules or explanatory meetings for promoting due understanding of the same. Where misconduct contrary to any laws and/or internal rules is detected, the concerned employee is subject to disciplinary action, and if any organized involvement in the detected incident is found, remediation is demanded of the concerned department.

The detailed functions of these "ethics and legal compliance hotlines" are provided in the booklet distributed to all employees for dissemination of Mitsubishi Electric Group Conduct Guidelines. These detailed functions also appear on posters displayed in each workplace (each department and operating base), on the handheld cards containing the contact information of internal and external contact points that are distributed to all employees, and on the Group website, to ensure that we communicate them to all employees.

The internal notification system is also in place in each affiliated company of the Mitsubishi Electric Group both in Japan and overseas.

| Question |
|--|
| 3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting? |
| Score |
| 1 |
| Comments |
| <p>There is evidence that the company has multiple channels to report instances of suspected corrupt activity. The company indicates that these channels are sufficiently varied to allow the employee to raise concerns across the management chain and to channels managed by independent external parties. There is evidence that the company's channels are available to all employees in all jurisdictions, including those employed by the group as third parties, and that they allow for confidential and, wherever possible, anonymous reporting.</p> <p>However, the company receives a score of '1' because there is no evidence that employees are encouraged to use the channels to seek advice about the company's anti-corruption policies, nor that the channels are available in multiple languages.</p> |
| Evidence |
| <p>[1] Mitsubishi Electric Group Anti-bribery Policy (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/risks/pdf/Anti-BriberyPolicy_en.pdf [p.2]</p> <p>5. Audit and Whistle-Blowing</p> <p>Each Group company shall implement an internal audit system, whistle-blowing system or any other appropriate system and procedures to detect any actual or attempted Bribery. Also, if any such act is discovered, each Group company shall investigate it properly, report it to the relevant authority as necessary, and take other corrective measures.</p> <p>[9] Mitsubishi Electric 2019 Annual Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/investors/library/annual_report/pdf/ar2019.pdf [p.23]</p> <p>Internal Control System</p> <p>(1) For the execution of the duties of the Audit Committee, its independence is secured by assigning employees whose job is exclusively to assist the Audit Committee members. In addition, internal regulations regarding the processing of expenses and debts incurred in the execution of the duties of the Audit Committee members are established and such expenses and debts are properly processed.</p> <p>A system for reporting to the Audit Committee is developed to report information about the Company and its subsidiaries to the Audit Committee via the divisions in charge of internal control, and an internal whistle-blower system is developed and its details are reported to the Audit Committee members.</p> <p>Furthermore, the Audit Committee members attend important meetings including Executive Officer meetings and conduct investigations such as interviews with Executive Officer and the executives of the Company's offices and subsidiaries, and undertake deliberations to determine audit policies, methods, implementation status, and results of the audit by regularly receiving reports from the Independent Auditor and Executive Officers in charge of audits.</p> <p>(2) Internal regulations and systems to ensure the properness of operations within the Mitsubishi Electric Group are established. Executive Officers take responsibility for constructing such systems within the areas over which they are appointed. Important matters are deliberated by convening Executive Officer meetings.</p> <p>Executive Officers regularly monitor the status of management of the systems. The divisions in charge of internal control monitor the status of design</p> |

[p.24]

and management of internal control system and regulations. Also an internal whistle-blower system is established and the matters reported thereto are informed to the Audit Committee members.

Furthermore, the status of management of the system is audited by internal auditors, and the audit results are reported regularly to the Audit Committee via Executive Officers in charge of audit.

[10] Establishment of internal and external ethics and legal compliance hotlines (Webpage)

Accessed 22/07/2019

<https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/hotlines/index.html>

Mitsubishi Electric has put in place "ethics and legal compliance hotlines" (internal notification system, so-called "whistle blowing system"), with the objective of promptly addressing fraudulent, illegal, and anti-ethical conducts as a self-disciplinary mechanism. This function is available through two notification channels, inside and outside the company. The outside channel is managed by independent law firms. The hotlines are operated pursuant to clearly defined internal regulations that ensure responses to anonymous informants, elimination of disadvantageous treatment of informants, and the confidentiality of all informants. Notifications are also accepted from business partners and companies, if it pertains to issues that arise out of their relationship with Mitsubishi Electric, including but not limited to business transactions.

Alleged issues of each notification are examined by a group composed "ad hoc" of members from departments capable of conducting investigation, depending on the nature of the notification. In case an alleged issue casts doubt on compliance with pertinent laws and/or internal rules, efforts are made to reinforce the prevalence of adequate norms through a revision of rules or explanatory meetings for promoting due understanding of the same. Where misconduct contrary to any laws and/or internal rules is detected, the concerned employee is subject to disciplinary action, and if any organized involvement in the detected incident is found, remediation is demanded of the concerned department.

The detailed functions of these "ethics and legal compliance hotlines" are provided in the booklet distributed to all employees for dissemination of Mitsubishi Electric Group Conduct Guidelines. These detailed functions also appear on posters displayed in each workplace (each department and operating base), on the handheld cards containing the contact information of internal and external contact points that are distributed to all employees, and on the Group website, to ensure that we communicate them to all employees.

The internal notification system is also in place in each affiliated company of the Mitsubishi Electric Group both in Japan and overseas.

4. Conflict of Interest

| Question |
|---|
| 4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members? |
| Score |
| 0 |
| Comments |
| There is no evidence to suggest that the company has a policy to regulate conflicts of interest. |
| Evidence |
| No evidence found. |

| Question |
|--|
| 4.2. Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company has procedures to manage conflict of interest or their oversight. |
| Evidence |
| No evidence found. |

| Question |
|---|
| 4.3. Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company has a policy regulating the employment of current or former public officials. |
| Evidence |
| No evidence found. |

| Question |
|--|
| 4.4. Does the company report details of the contracted services of serving politicians to the company? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company reports details of the contracted services of serving politicians. |
| Evidence |
| No evidence found. |

5. Customer Engagement

5.1 Contributions, Donations and Sponsorships

| Question |
|---|
| 5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions? |
| Score |
| 0 |
| Comments |
| <p>There is some evidence that the company has a procedure on political contributions, to ensure that these payments are not used as vehicles for bribery and corruption. However, there is evidence that the company may make political contributions in some circumstances.</p> <p>Where political contributions are permitted, there is no evidence to suggest that the company requires authorisation from an individual with legal expertise. In addition, there is no clear evidence that this procedure applies to all employees, board members, third parties and other entities controlled by the company.</p> |
| Evidence |
| <p>[2] Mitsubishi Electric 2018 CSR Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/sites/GWS/en/sustainability/reports/pdf/2018/CSR_report_2018.pdf [p.51]</p> <p>Support and Responses to Political Activities</p> <div> <p>The Mitsubishi Electric Group provides support to political activities only upon full consideration of its social standing as defined in its corporate mission, and in compliance with relevant laws and regulations in each country.</p> <p>For example, when Mitsubishi Electric makes a political donation in Japan, the Corporate Administration</p> </div> <div> <p>Division screens all cases in detail in accordance with the Political Fund Control Law, and ensures adherence to all internal procedures. Additionally, in public elections, we make every effort neither to infringe on the Public Offices Election Act nor deviate from sound social morals.</p> </div> |
| <p>[1] Mitsubishi Electric Group Anti-bribery Policy (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/risks/pdf/Anti-BriberyPolicy_en.pdf [p.2]</p> <p>2. Prohibition of Bribery</p> <p>Each Group company, its officers, and employees shall not engage in Bribery in any country or region in which the Group company carries out business. Furthermore, we do not pursue profits if such profits can be realized only by offering bribes.</p> <p>If any demand for Bribery or any act which may constitute Bribery is made by a Public Official or a private individual or corporation, each Group company, its officers, and employees shall refuse such demand.</p> <p>In this Policy, "Bribery" means provision of any gift, entertainment or any other benefit (regardless of whether such benefit is a tangible or intangible benefit, and including bearing expenses, giving any donation or aid or making facilitation payment^(*)) or promise to provide or offer to provide such benefit to any person, whether directly or indirectly and whether such person is a Public Official or a private individual or corporation, with the expectation or appearance of improperly obtaining or maintaining business or other inappropriate benefit or having such person improperly perform any act or improperly refrain from performing any act related to that person's functions or duties.</p> |

| Question |
|--|
| 5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company discloses any details of its political contributions. |
| Evidence |
| No evidence found. |

| Question |
|--|
| 5.1.3. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries? |
| Score |
| 0 |
| Comments |
| There is no publicly available evidence that the company has a policy or procedure on charitable donations and sponsorships. |
| Evidence |
| <p>[1] Mitsubishi Electric Group Anti-bribery Policy (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/risks/pdf/Anti-BriberyPolicy_en.pdf</p> <p><u>2. Prohibition of Bribery</u> Each Group company, its officers, and employees shall not engage in Bribery in any country or region in which the Group company carries out business. Furthermore, we do not pursue profits if such profits can be realized only by offering bribes. If any demand for Bribery or any act which may constitute Bribery is made by a Public Official or a private individual or corporation, each Group company, its officers, and employees shall refuse such demand. In this Policy, "Bribery" means provision of any gift, entertainment or any other benefit (regardless of whether such benefit is a tangible or intangible benefit, and including bearing expenses, giving any donation or aid or making facilitation payment^(*1)) or promise to provide or offer to provide such benefit to any person, whether directly or indirectly and whether such person is a Public Official or a private individual or corporation, with the expectation or appearance of improperly obtaining or maintaining business or other inappropriate benefit or having such person improperly perform any act or improperly refrain from performing any act related to that person's functions or duties.</p> |

5.2 Lobbying

| Question |
|---|
| 5.2.1 Does the company have a policy and/or procedure covering responsible lobbying? |
| Score |
| 0 |
| Comments |
| There is no publicly available evidence that the company has a policy and/or procedure on lobbying. |
| Evidence |
| No evidence found. |

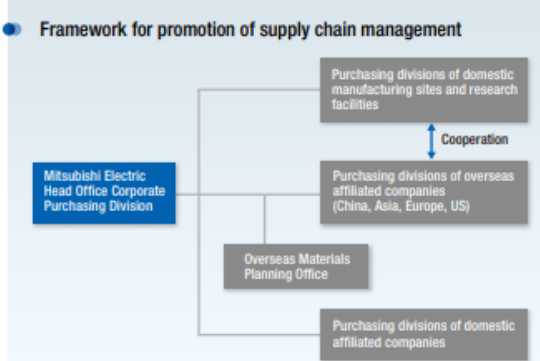
| Question |
|---|
| 5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company publishes any information on its lobbying aims, topics or activities. |
| Evidence |
| No evidence found. |

| Question |
|--|
| 5.2.3 Does the company publish full details of its global lobbying expenditure? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company publishes any details about its global lobbying expenditure. |
| Evidence |
| No evidence found. |

5.3 Gifts and Hospitality

| Question |
|--|
| 5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption? |
| Score |
| 0 |
| Comments |
| There is no publicly available evidence that the company has a policy or procedure on gifts and hospitality. |
| Evidence |
| <p>[1] Mitsubishi Electric Group Anti-bribery Policy (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/risks/pdf/Anti-BriberyPolicy_en.pdf</p> <p><u>2. Prohibition of Bribery</u> Each Group company, its officers, and employees shall not engage in Bribery in any country or region in which the Group company carries out business. Furthermore, we do not pursue profits if such profits can be realized only by offering bribes. If any demand for Bribery or any act which may constitute Bribery is made by a Public Official or a private individual or corporation, each Group company, its officers, and employees shall refuse such demand. In this Policy, "Bribery" means provision of any gift, entertainment or any other benefit (regardless of whether such benefit is a tangible or intangible benefit, and including bearing expenses, giving any donation or aid or making facilitation payment^(*1)) or promise to provide or offer to provide such benefit to any person, whether directly or indirectly and whether such person is a Public Official or a private individual or corporation, with the expectation or appearance of improperly obtaining or maintaining business or other inappropriate benefit or having such person improperly perform any act or improperly refrain from performing any act related to that person's functions or duties.</p> |

6. Supply Chain Management

| Question |
|---|
| 6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base? |
| Score |
| 0 |
| Comments |
| <p>There is some evidence that the company's purchasing division is involved in the oversight of its supply chain.</p> <p>However, the extent the purchasing division is involved in the oversight of the supplier base is unclear. In addition, there is no evidence that the company requires the involvement of its procurement department in the establishment of its supplier base.</p> |
| Evidence |
| <p>[9] Mitsubishi Electric 2019 Annual Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/investors/library/annual_report/pdf/ar2019.pdf [p.21]</p> <div style="border: 1px solid green; padding: 10px; margin: 10px 0;"> <p>Main agenda of the CSR Committee (held in April 2019)</p> <ul style="list-style-type: none"> • Report on achievements made in the previous fiscal year and activities planned in the current fiscal year • Response to the sustainable development goals (SDGs) • Further enhancement of information disclosure by taking into account ESG (environment, social, governance) investment • Human rights initiatives • Supply chain management • Long-term environmental vision </div> <p>[p.32]</p> <div style="background-color: #00a0c0; color: white; padding: 5px; margin: 10px 0;"> Supply Chain Management </div> <p>Basic policy</p> <p>The Mitsubishi Electric Group ensures fair and impartial selection and evaluation of business partners in Japan and overseas by providing an explanation of the Group's Purchasing Policy and CSR Procurement Policy, and requesting business partners' understanding of these policies. By ensuring proper evaluation of suppliers based on selection and evaluation criteria established by the Group, risks are also mitigated along the supply chain.</p> <p>The Group's criteria for selecting and evaluating suppliers include not only quality, cost, delivery schedules, and services, but also initiatives in response to environmental regulations and CSR initiatives. As a basic policy, the Group preferentially procures materials from suppliers who rank high in a comprehensive evaluation.</p> <p>Framework for Promotion of Supply Chain Management</p> <p>The Mitsubishi Electric Group launched the WZ21II (Worldwide Strategic Integration for Global Markets in the 21st Century Advance to the Next Stage)* activity in April 2017, and is promoting optimal procurement activities suited to each region through the Materials Planning Office. The Materials Planning Office was established in collaboration among regional corporate offices in China, Asia, Europe and Americas to implement purchasing strategies through conferences of</p> <p>procurement officers and other such meetings. Accompanying this initiative, the supply chain has also expanded to various countries where the Group operates, so initiatives are also pursued to mitigate any perceived risks regarding a range of issues related to labor laws and regulations, and to environmental problems.</p> <p><small>* WZ21II: An initiative of purchasing departments to work toward achieving the Mitsubishi Electric Group's management goal of reaching net sales of 5 trillion yen and an operating income ratio of 8% or more by 2020.</small></p> <div style="border: 1px solid #00a0c0; padding: 10px; margin: 10px 0;"> <p>Framework for promotion of supply chain management</p>  <pre> graph TD A[Mitsubishi Electric Head Office Corporate Purchasing Division] --- B[Purchasing divisions of domestic manufacturing sites and research facilities] A --- C[Purchasing divisions of overseas affiliated companies (China, Asia, Europe, US)] A --- D[Overseas Materials Planning Office] D --- E[Purchasing divisions of domestic affiliated companies] B <--> Cooperation C </pre> </div> |

[2] Mitsubishi Electric 2018 CSR Report (Document)

Accessed 22/07/2019

https://www.mitsubishielectric.com/sites/GWS/en/sustainability/reports/pdf/2018/CSR_report_2018.pdf

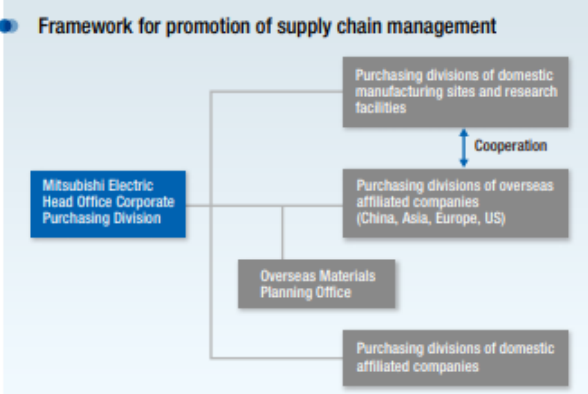
[p.35]

Communication with stakeholders

Status of Communication

A strong relationship of trust with stakeholders is indispensable for conducting business activities. We provide various opportunities to help stakeholders understand the Mitsubishi Electric Group and ask for their expectations, requests, and opinions.

| Major stakeholders | Responsibilities and issues | Major contact departments | Major communication opportunities |
|--|--|--|---|
| Customers Individual and corporate customers | <ul style="list-style-type: none"> Improvement of customer satisfaction Product safety and quality Customer response and support | <ul style="list-style-type: none"> Sales departments Quality departments | Inquiry centers (home appliances: Customer Relations Center; building systems: Information Center, etc.), sales activities, websites, showrooms, events, exhibitions, customer questionnaires, mass media / commercials |
| Employees Workers related to the Mitsubishi Electric Group in general | <ul style="list-style-type: none"> Occupational health and safety Respect for human rights Human resource development Respect for diversity | <ul style="list-style-type: none"> Personnel departments CSR departments | Hotlines, intranets, in-house bulletins, training programs, meetings between management and employees, employee awareness surveys |
| Government, local governments, industrial organizations Governmental institutions, local governments and industrial organizations relevant to the business activities of the Mitsubishi Electric Group | <ul style="list-style-type: none"> Compliance with laws and regulations Compliance with restrictions Policy proposals | <ul style="list-style-type: none"> External affairs department | Participation in advisory councils and committees, participation in the activities of industrial and economic organizations |
| NGOs and NPOs NGOs/NPOs citizens groups, etc. with relevance to the social and environmental aspects of Mitsubishi Electric | <ul style="list-style-type: none"> Grants and partnerships through contributions to regional communities Dialogues on social and environmental issues | <ul style="list-style-type: none"> Administration departments | Philanthropic activities (funds, foundations, volunteer activities), dialogues on social and environmental issues |
| Business partners Business partners that supply raw materials and parts | <ul style="list-style-type: none"> Fair transactions CSR promotion through the supply chain | <ul style="list-style-type: none"> Materials departments | Activities aimed at the joint creation of costs, information sessions on CSR procurement, BCP seminars, meetings based on the results of fair selection and evaluation of suppliers |
| Regional communities Communities near Mitsubishi Electric offices | <ul style="list-style-type: none"> Contribution to four activity philanthropic areas (social welfare; science and technology; global environmental conservation; culture, art and sports) | <ul style="list-style-type: none"> Administration departments | Contributions through business, philanthropic activities (funds, overseas foundations, volunteer activities), grants to universities, plant inspection tours, factory open-house events |
| Shareholders Shareholders, investment institutions, investors, etc. directly or indirectly possessing Mitsubishi Electric shares | <ul style="list-style-type: none"> Increase in corporate value Proper redistribution of profits Information disclosure Response to ESG investments | <ul style="list-style-type: none"> IR departments | Financial results presentation meeting (4 times yearly), general meetings of shareholders (once a year), IR events/individual meetings, websites (IR resource library), responses to interviews, shareholder communications |
| Others Academic institutions and research institutions | <ul style="list-style-type: none"> Cooperation in creating innovation Joint studies | <ul style="list-style-type: none"> R&D departments | Industry-academia cooperation in research, stakeholder dialogues (once a year) |
| Future generations | <ul style="list-style-type: none"> Provision of education opportunities | <ul style="list-style-type: none"> Administration departments Overseas foundations | Inquiry centers, philanthropic programs, factory inspection tours, grants via foundations, events |

| Question |
|--|
| 6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging with its suppliers? |
| Score |
| 0 |
| Comments |
| There is no clear evidence that the company conducts due diligence on its supply chain. The company's Annual Report indicates that it evaluates and reviews its relationship with its suppliers periodically but it is not clear that this constitutes formal due diligence nor that such reviews take into account anti-bribery and corruption risks. |
| Evidence |
| <p>[9] Mitsubishi Electric 2019 Annual Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/investors/library/annual_report/pdf/ar2019.pdf [p.32]</p> <p>Supply Chain Management</p> <p>Basic policy The Mitsubishi Electric Group ensures fair and impartial selection and evaluation of business partners in Japan and overseas by providing an explanation of the Group's Purchasing Policy and CSR Procurement Policy, and requesting business partners' understanding of these policies. By ensuring proper evaluation of suppliers based on selection and evaluation criteria established by the Group, risks are also mitigated along the supply chain.</p> <p>The Group's criteria for selecting and evaluating suppliers include not only quality, cost, delivery schedules, and services, but also initiatives in response to environmental regulations and CSR initiatives. As a basic policy, the Group preferentially procures materials from suppliers who rank high in a comprehensive evaluation.</p> <p>Framework for Promotion of Supply Chain Management The Mitsubishi Electric Group launched the WΣ21II (Worldwide Strategic Integration for Global Markets in the 21st Century Advance to the Next Stage)* activity in April 2017, and is promoting optimal procurement activities suited to each region through the Materials Planning Office. The Materials Planning Office was established in collaboration among regional corporate offices in China, Asia, Europe and Americas to implement purchasing strategies through conferences of</p> <p>procurement officers and other such meetings. Accompanying this initiative, the supply chain has also expanded to various countries where the Group operates, so initiatives are also pursued to mitigate any perceived risks regarding a range of issues related to labor laws and regulations, and to environmental problems.</p> <p>* WΣ21II: An initiative of purchasing departments to work toward achieving the Mitsubishi Electric Group's management goal of reaching net sales of 5 trillion yen and an operating income ratio of 8% or more by 2020.</p>  <pre> graph LR A[Mitsubishi Electric Head Office Corporate Purchasing Division] --- B[Purchasing divisions of domestic manufacturing sites and research facilities] A --- C[Purchasing divisions of overseas affiliated companies (China, Asia, Europe, US)] A --- D[Overseas Materials Planning Office] A --- E[Purchasing divisions of domestic affiliated companies] B <--> C </pre> |
| <p>[2] Mitsubishi Electric 2018 CSR Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/sites/GWS/en/sustainability/reports/pdf/2018/CSR_report_2018.pdf [p.57]</p> <p>Business continuity in the supply chain</p> <p>At Mitsubishi Electric, we pursue initiatives to avoid situations in which a large-scale disaster or other unavoidable circumstance imposes serious damage on suppliers, severs the supply of materials, or obstructs our production activities.</p> <ol style="list-style-type: none"> Evaluation of BCP risks among suppliers From fiscal 2015, we have begun an evaluation of BCP risks among our suppliers in Japan using a company-wide unified index, and are bringing visibility to suppliers with high risks. Activities for mitigating supplier risks To mitigate the risks that have come to light through the BCP risk evaluation of suppliers, we recommend multi-company purchasing, and request our suppliers to multi-site their production centers. We also Activities for ensuring prompt initial response at times of disaster To ensure prompt initial response at times of disaster, we have created and actively utilize a map search system that allows us to search on a map the locations of suppliers in the vicinity of a disaster point. <p>Hereafter, we will also promote multi-company purchasing and multi-siting of production centers by suppliers overseas, to ensure stable procurement activities in our overseas production centers.</p> |

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Our Purchasing Philosophy

Mitsubishi Electric purchases a wide variety of materials and components from both Japanese and overseas markets. We recognize our corporate responsibility and are eager to provide business opportunities for the communities in which we operate.

1. Easy Access and Equal Opportunity

To guarantee our customers the highest-quality products, we are constantly searching for new suppliers. We encourage business partners from all over the world, regardless of size, to contact us about submitting a quotation. The decision to embark on a new business relationship is made after careful consideration of three major factors: product price, product quality, and delivery performance. To ensure continued high quality and efficiency, we periodically review our relationships with our partners.

2. Mutual Prosperity

We believe in long-term relationships built upon understanding and trust. This will allow the participation of our business partners during the product development stage, paving the way for mutual prosperity.

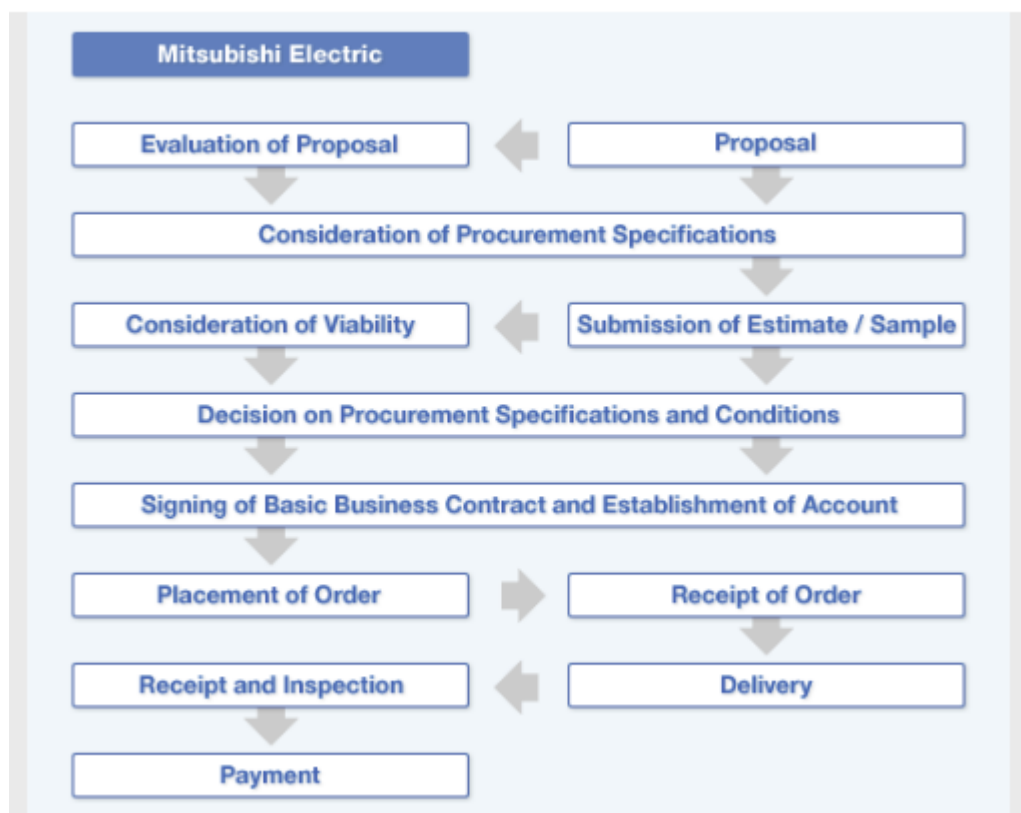
3. Ecological Soundness


We are interested in the materials and manufacturing processes used by our suppliers. Because we value the environment, we buy only ecologically sound products. Our mission is to satisfy the needs of people around the globe. To meet their growing expectations, we must widen and strengthen our affiliations with companies all over the world. We are seeking cooperation, not just business, and are looking for potential partners who are willing to join us in our drive toward global prosperity.

[12] Purchasing Process (Webpage)

Accessed 22/07/2019

<https://www.mitsubishielectric.com/en/about/procurement/process/index.page>



| Question |
|--|
| 6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place? |
| Score |
| 1 |
| Comments |
| <p>There is evidence that the company requires suppliers to have adequate anti-bribery and corruption policies and procedures in place. The company clearly states that all suppliers must have, at minimum, policies that prohibit foreign and domestic bribery, prohibit facilitation payments, as well as policies and procedures to address gifts and hospitality and whistleblowing. There is evidence that the company takes active steps to ensure this by requesting that all suppliers follow its own anti-bribery policies and procedures and by requesting them to sign an agreement to implement CSR guidelines in their company.</p> <p>However, the company receives a score of '1' there is no evidence that suppliers must have policies in place covering conflicts of interest. It is also not clear that any assurance is conducted when there is a significant change in the business relationship.</p> |
| Evidence |
| <p>[2] Mitsubishi Electric 2018 CSR Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/sites/GWS/en/sustainability/reports/pdf/2018/CSR_report_2018.pdf [p.115]</p> <p>Requests to Suppliers</p> <p>Suppliers to the Mitsubishi Electric Group are requested to gain an understanding of the Group's Purchasing Policy and CSR Procurement Policy, and to disseminate these policies to their supply chain. They are especially requested to thoroughly comply with the points below, which the Group has identified as priority issues to be addressed through the entire supply chain. Additionally, new suppliers are asked to submit their agreement to</p> <p>comply with the CSR Procurement Guidelines and a completed survey form upon reading and understanding the guidelines.</p> <p>For details, please refer to each of our guidelines (Green Procurement Standards Guide, CSR Procurement Guidelines).</p> <p> Procurement Activities</p> <div> <ol style="list-style-type: none"> 1. Compliance with laws, regulations and social norms Please comply with laws and regulations in countries and regions where you engage in business, as well as with international agreements, transaction ethics, and social norms. (Elimination of corrupt practices such as bribery, embezzlement, and illegal political contributions; compliance with relevant laws and regulations, including the Antimonopoly Act, Subcontractor Act, and Foreign Exchange Act; prohibition of the illegal acquisition and utilization of intellectual property; proper information disclosure; execution of faithful transactions based on contracts, etc.) 2. Respect for human rights Please respect basic human rights in countries and regions where you engage in business. (Prohibition of inhumane treatment like forced labor, child labor, abusive treatment, human trafficking, and harassment; prohibition of all forms of discrimination; proper payment of wages; proper management of working hours; respect for the right to organize, etc.) 3. Consideration for health and safety Please give due consideration to health and safety in all countries and regions where you engage in business. (Safety measures for machines and devices; evaluation and measures against the occurrence of accident and health hazard risks; preventive measures against large-scale disasters and accidents, etc.) 4. Environmental considerations Please take measures to provide products and services that place minimum burden on the environment. (Acquisition, maintenance and management of environmental management system certification; compliance with environmental laws and regulations; proper management of chemical substances in products, etc.) 5. Product and service quality and safety Please take measures to ensure the quality and safety of products and services you provide. (Design, evaluation and testing for ensuring safety; compliance with laws and regulations related to safety; construction, maintenance and management of quality management systems, etc.) 6. Security measures for information systems Please take appropriate measures to protect against computer network threats. (Construction of prevention measures against computer viruses and cyberattacks; prevention of information leakage through proper management of confidential information and personal information, etc.) </div> |

[p.117]

Communication with Suppliers

At each office, the Mitsubishi Electric Group holds seminars that disseminate a full understanding of the Group's Purchasing Policy and CSR Procurement Policy among suppliers. Through these initiatives, suppliers are asked to concur with the policies and strengthen CSR initiatives at their companies as well.

In fiscal 2018, as before, we held a variety of seminars for our suppliers, including BCP* seminars, seminars to disseminate an understanding of changes in chemical substance restrictions such as the EU RoHS Directive, and compliance programs (export control, information security and management, the Subcontract Act, etc.). Direct exchanges of views are also held with our suppliers in regard to matters outlined in the supplier survey form. In these ways, we will maintain close communication with our suppliers and continue to organize seminars that promote further CSR initiatives.

* BCP (business continuity planning): Being prepared for any disaster or other emergency situation by planning how to minimize damage to the company and how to continue or restore business activities.

The Mitsubishi Electric Group believes it is important to provide an understanding of the Group's policies to overseas suppliers as well, and thus holds CSR seminars and other relevant seminars in overseas sites.



Exchange of views with suppliers

Fiscal 2018 seminars

| | No. of site | No. of participating companies |
|--|-------------|--|
| CSR seminar | 24 | (In Japan) Approx. 1,800 companies (Overseas) 243 companies |
| BCP seminar (anti-earthquake and disaster mitigation measures) | 13 | Approx. 400 companies |
| Information session on chemical substance restrictions | 19 | Approx. 5,000 companies |

* The number of companies is the cumulative total number of companies.

[13] CSR Procurement Policy (Webpage)

Accessed 22/07/2019

<https://www.mitsubishielectric.com/en/about/procurement/policy/index.page>

CSR Procurement Policy

We carry out distribution activities in line with our "CSR Procurement Policy," which was established in fiscal 2008.

1. Compliance with domestic and foreign laws/regulations and social standards
 - 1) Ensuring compliance with laws and regulations
 - 2) Respecting human rights and prohibiting discrimination, child labor, and forced labor
 - 3) Creating proper work environments and giving consideration to safety and health
2. Assurance of quality and safety of products and services
3. Environmental considerations
 - 1) Procuring materials with less negative impact on the environment
 - 2) Ensuring strict management of harmful chemical substances based on an environmental management system
4. Promotion of fair trade based on corporate ethics
 - 1) Practicing honest trade on fair and equal footing, based on laws/regulations and agreements
 - 2) Ensuring strict management and safeguarding of information by establishing an information security system
 - 3) Thorough elimination of fraudulence, bribery, and other such conduct that violates corporate ethics

[14] CSR Procurement Guidelines (Document)

Accessed 22/07/2019

https://www.mitsubishielectric.com/en/about/procurement/green/downloads/pdf/CSR_English.pdf

[p.3]

II . Requests to Suppliers**1.Understanding and respecting the Group's Purchasing Policy and the CSR Procurement Policy**

• Basic policy of the Mitsubishi Electric Group is to prioritize procurement from suppliers with a comprehensively high evaluation during supplier selection and evaluation. With the progress of globalization, the supply chain of the Mitsubishi Electric Group has expanded to various countries and we recognize that our supply chain may have issues concerning aspects such as labor laws and environment. In order to promote initiatives aimed at reducing risks in these areas, we ask our suppliers to understand Purchasing Policy and CSR Procurement Policy of the Group as well as to share this information within their supply chain.

[p.9]

3. Fairness and Ethics**[3-1] Core Principles**

- (1) Prohibit corruption that violates corporate ethics, such as fraud and bribery.
- (2) Conduct sincere, fair and equal transactions based on laws and contracts.
- (3) Establish an appropriate management system to comply with laws and regulations related to import and export related business.
- (4) Disclose appropriate information to stakeholders in accordance with applicable laws and regulation.
- (5) Make efforts towards prohibiting the use of conflict minerals in cooperation with our business partners.
- (6) Operate a highly effective reporting system and make efforts to detect and prevent the occurrence of misconduct at an early stage.

[3-2] Detailed Explanation**(1) Acts of bribery, inappropriate donations and insider trading**

- ① Prohibit bribes and illegal political donations, and keep a sound and normal relationship with political and administrative officials.
- ② Prohibit providing entertainment, gifts or other benefits to people, such as civil servants, customers and business partners both in Japan and abroad, in order to acquire and maintain transactions or other unfair profits.
- ③ Prohibit trading of items such as company shares based on important undisclosed information concerning the business of customers etc. (insider trading).

(2) Providing improper benefits to antisocial forces

- ① Prohibit any form of relationship, including business activities, with antisocial forces that adversely affect the social order or healthy business. Prohibit providing benefits to antisocial forces.

(3) Abusive behavior of superior bargaining position

- ① Prohibit imposing unreasonable demands or using the superior bargaining position as the purchaser and thereby unilaterally decide the terms and conditions of transactions with suppliers.

(4) Unreasonable transaction restrictions such as cartels and bid rigging

- ① Prohibit acts which impede competition through Information exchanges / agreements on items such as price / quantity / sales area of products and services with competitor companies (i.e. cartels) or exchange information / negotiate for bidders and winning bids with other bidders (i.e. bid rigging).

(5) Protection of intellectual property rights

- ① Respect the intellectual property rights (such as patents, design rights, copyrights) of others, including customers and business partners, and prohibit misuse or unauthorized use of third party's intellectual property. Also, transfer of technology and know-how must be done in a method that protects intellectual property rights.
- ② Do not violate intellectual property rights such as illegal copying of computer software or other copyrighted works.

(6) Proper security export control

[p.10]

- ① Develop a clear management system and carry out appropriate procedures regarding the export of technologies and goods regulated by laws and regulations (* 5).
(*5) Products / parts, technologies, facilities, and software regulated by laws and ordinances on export restrictions under international agreement (such as the Wassenaar Arrangement on Export Controls for Conventional Arms and Dual-Use Goods and Technologies) as well as narcotics, explosives and items that infringe patent rights which are prohibited from being imported by the Customs Law.

(7) Information disclosure to stakeholders

- ① Public information on business activities, financial situation, company's products / services, business opportunities, positioning etc. should not be false or misleading.
- ② Prohibit false/misleading descriptions regarding the quality, standards and other contents of the company's products / services to consumers or customers.

(8) Prohibiting use of conflict minerals

- ① Formulate policies on responsible mineral procurement, and if necessary, investigate the origin and distribution process of minerals to confirm that tantalum, tin, tungsten, gold, etc. in the products are not directly or indirectly funding armed group that are causing human rights violations in the Democratic Republic of Congo or neighboring countries etc. and are not funding conflict or crime.

(9) Setting up a reporting desk for fraudulent activity

- ① Protect the confidentiality and anonymity of your workers and whistleblowers of your business partners and establish a reporting system that allows them to express concern without fear of retaliation.
- ② Prohibit retaliation against your workers and whistleblowers of your business partners on the grounds that they have reported concerns.

[15] CSRの重要課題に関するマネジメント状況 / Management status of CSR issues

Accessed 09/08/2019

http://www.mitsubishielectric.co.jp/corporate/csr/management/management/materiality_progress/index.html

2018年度 of 取組項目と実績

| 取組項目 | 目標/取組指標 (KPI) 【 】 内は定量目標 | 実績 | 範囲 | 評価 |
|---------------------|--|---|-------------------|----|
| [...] | | | | |
| コンプライアンス研修の継続的実施 | 多様な手法を駆使したコンプライアンス教育の継続的実施 | 講習会、eラーニング、マニュアル配布等様々なツールを用いた教育を実施（三菱電機 法務・コンプライアンス部による講習会 240 回実施、9,071 名参加） | 三菱電機グループ全体（国内、海外） | ○ |
| | コンプライアンス eラーニングの受講率 100%維持 【100%維持】 | 受講率 100%維持 | 三菱電機 | ○ |
| 公正な競争（独占禁止法違反防止）の推進 | 各事業の特色を反映したケーススタディを用いた実践的な研修を継続実施 | 独占禁止法教育の実施 | 三菱電機グループ全体（国内、海外） | ○ |
| | 同業他社との接触に関するルール化に伴う課題抽出・運用改善 | 抽出された課題に対応したシステム改修、運用の改善 | | |
| | 独占禁止法の垂直的制限規制への対応強化（ガイドラインの策定等） | リスクの高い地域での、拠点毎のガイドラインの策定及びガイドラインを用いた教育の実施 | | |
| 汚職防止（贈収） | 贈収防止施策の充実：贈収防止教育の実施、規則・ガ | 贈収防止教育の実施 | 三菱電機 | ○ |

| | | | | |
|---------------------------------|--|---|--|---|
| 賄防止) の徹底 | イドラインの定着に向けたモニタリングの実施 | 規則の適用を海外関係会社へ拡大 | グループ全体 (国内、海外) | |
| | | ガイドラインに民間企業間の贈収賄に関する注意事項を追加 | | |
| CSR 調達 (環境、品質、人権、コンプライアンス等) の推進 | CSR 調達ガイドラインを制定し、2018 年度調査サプライヤーに対しては遵守同意を入手【100%】 | CSR 調達ガイドラインを 2018 年 6 月に制定 | 三菱電機、三菱電機グループ (国内、海外関係会社の一部) のサプライチェーン | △ |
| | | CSR 調達ガイドラインに対する同意確認書の提出を約 1,400 社に要請、91%取得 (承諾率 82%) | | |
| | 海外サプライヤーの調査対象を欧州や米国まで拡大 | 欧州: 5 社、米国: 20 社のサプライヤーへ調査を実施 | | ○ |

Translation:

FY 2019 initiatives and results

| Action items | Target / KPI | Performance | Range | Evaluation |
|--|---|--|---|------------|
| [...] | | | | |
| Compliance training on a continuous basis | Provide compliance education that utilizes diverse methods, on a continuous basis | Provide compliance education that utilizes diverse methods such as training session, e-learning, and distributions of manuals, on a continuous basis (240 training sessions by Mitsubishi Electric Legal and Compliance Departments; 9,701 employees joined) | All Mitsubishi Electric Group companies (Japan, overseas) | ○ |
| | Maintain a 100% attendance in e-learning programs on compliance 【maintain rate of 100%】 | Maintained a 100% attendance rate | Mitsubishi Electric | ○ |
| Fair competition (prevention of antimonopoly violations) | Provide practical training in reference to case studies that reflect the characteristics of each business, on a continuous basis | Provided education on the Antimonopoly Act | All Mitsubishi Electric Group companies (Japan, overseas) | ○ |
| | Identify issues and improve operations due to Systematization of some rules concerning contacts with other companies in the same business | Repaired the system and improved operations depending on identified issues | | |
| | Strengthen responses to vertical restraints and regulations of antimonopoly laws (formulate the guidelines etc.) | Selected offices having high area risks, formulated the guidelines for each office, and provided education with the guidelines | | |

| | | | | | |
|--|--|---|--|---|--|
| Corruption prevention (prevention of bribery) | Enhance corruption prevention measures : | Provided bribery prevention education | All Mitsubishi Electric Group companies (Japan, overseas) | ○ | |
| | provide bribery prevention education, conduct monitoring with an eye to the establishment of regulations and guidelines | Expanded the adoption of regulation to overseas group companies | | | |
| | | Added notes on bribery between private companies in the guideline | | | |
| CSR procurement (environment, quality, human rights, compliance, etc.) | Formulate CSR procurement guidelines, and obtain a compliance agreement from suppliers targeted for the FY2019 survey 【100%】 | Formulated CSR procurement guidelines in June 2018 | Mitsubishi Electric, Mitsubishi Electric Group companies (Japan, some overseas) supply chain | ○ | |
| | | Requested approx. 1,400 companies to submit a compliance agreement to CSR procurement guidelines (acquisition rate 90%; acceptance rate 82 %) | | | |
| | Expand the scope of the survey of overseas suppliers to Europe and the U.S. | Conducted the survey of overseas suppliers (five companies in Europe and twenty companies in the United States) | | | |

| Question |
|---|
| 6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor? |
| Score |
| 2 |
| Comments |
| There is evidence that the company takes steps to ensure that its sub-contractors have adequate anti-bribery and corruption programmes in place and that the substance of its anti-corruption and bribery programme and standards are included in subcontracts throughout the supply chain. This evidence is in the form of a set of supplier principles that sets the minimum standards of ethical behaviour expected throughout the supply chain. |
| Evidence |
| <p>[14] CSR Procurement Guidelines (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/about/procurement/green/downloads/pdf/CSR_English.pdf [p.9]</p> <p>3. Fairness and Ethics</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>[3-1] Core Principles</p> <ol style="list-style-type: none"> (1) Prohibit corruption that violates corporate ethics, such as fraud and bribery. (2) Conduct sincere, fair and equal transactions based on laws and contracts. (3) Establish an appropriate management system to comply with laws and regulations related to import and export related business. (4) Disclose appropriate information to stakeholders in accordance with applicable laws and regulation. (5) Make efforts towards prohibiting the use of conflict minerals in cooperation with our business partners. (6) Operate a highly effective reporting system and make efforts to detect and prevent the occurrence of misconduct at an early stage. </div> <p>[3-2] Detailed Explanation</p> <ol style="list-style-type: none"> (1) Acts of bribery, inappropriate donations and insider trading <ol style="list-style-type: none"> ① Prohibit bribes and illegal political donations, and keep a sound and normal relationship with political and administrative officials. ② Prohibit providing entertainment, gifts or other benefits to people, such as civil servants, customers and business partners both in Japan and abroad, in order to acquire and maintain transactions or other unfair profits. ③ Prohibit trading of items such as company shares based on important undisclosed information concerning the business of customers etc. (insider trading). <p>[p.10]</p> <ol style="list-style-type: none"> (9) Setting up a reporting desk for fraudulent activity <ol style="list-style-type: none"> ① Protect the confidentiality and anonymity of your workers and whistleblowers of your business partners and establish a reporting system that allows them to express concern without fear of retaliation. ② Prohibit retaliation against your workers and whistleblowers of your business partners on the grounds that they have reported concerns. <p>[p.12]</p> <ol style="list-style-type: none"> (2) CSR efforts for our business partners <ol style="list-style-type: none"> ① If your company has its own policies and guidelines, propose clear and accurate information to business partners concerning initiatives, expectations and achievements based on them. ② Please communicate with your major suppliers to promote the contents of this Guideline. Also, if necessary, please conduct a questionnaire survey and/or a site visit survey to confirm the risks appropriately. If there is a problem, please encourage your supplier to make improvements. |

| Question |
|--|
| 6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company publishes any data on ethical or anti-bribery and corruption investigations relating to its suppliers, or the associated disciplinary actions. |
| Evidence |
| No evidence found. |

7. Agents, Intermediaries and Joint Ventures

7.1 Agents and Intermediaries

| Question |
|---|
| 7.1.1 Does the company have a clear policy on the use of agents? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company has a policy to regulate the use of agents. |
| Evidence |
| No evidence found. |

| Question |
|--|
| 7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company conducts anti-bribery and corruption due diligence on its agents or intermediaries. |
| Evidence |
| No evidence found. |

| Question |
|--|
| 7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company aims to establish the beneficial ownership of its agents. |
| Evidence |
| No evidence found. |

| Question |
|---|
| 7.1.4 Does the company's anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company includes anti-bribery and corruption clauses in its contracts with agents and intermediaries. |
| Evidence |
| No evidence found. |

| Question |
|---|
| 7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices? |
| Score |
| 1 |
| Comments |
| <p>Based on publicly available information, there is some evidence that the company highlights and addresses incentive structures for agents as a factor in bribery and corruption risk.</p> <p>However, the company receives a score of '1' because there is no evidence that it has controls in place to mitigate these risks, such as imposing a threshold on the payment of sales commissions to agents or a requirement that remuneration is paid in stage payments or into local bank accounts.</p> |
| Evidence |
| <p>[1] Mitsubishi Electric Group Anti-bribery Policy (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/risks/pdf/Anti-BriberyPolicy_en.pdf [p.2]</p> <p><u>3. Prohibition of Payment used for Bribery to Third Party</u> No Group company, its officers, or employees shall make any payment to any agent, distributor, dealer consultant or any other third party if such payment may be used or is suspected to be used for Bribery.</p> |

| Question |
|--|
| 7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company publishes any details of the agents currently contracted to act for or and on behalf of the company. |
| Evidence |
| No evidence found. |

| Question |
|--|
| 7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company publishes any data on ethical or bribery and corruption-related investigations, incidents or the associated disciplinary actions involving its agents. |
| Evidence |
| No evidence found. |

7.2 Joint Ventures

| Question |
|---|
| 7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company conducts anti-bribery and corruption due diligence on its joint ventures. |
| Evidence |
| No evidence found. |

| Question |
|--|
| 7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture relationships, and does it require anti-bribery and corruption clauses in its contracts with joint venture partners? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company commits to establishing or implementing anti-bribery and corruption policies or procedures in its joint ventures, nor that it requires anti-bribery and corruption clauses in its contracts with joint venture partners. |
| Evidence |
| No evidence found. |

| Question |
|---|
| 7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company commits to take an active role in preventing bribery and corruption in all of its joint ventures. |
| Evidence |
| No evidence found. |

8. Offsets



| Question |
|---|
| 8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company addresses the corruption risks associated with offset contracting, nor that a dedicated body, department or team is responsible for monitoring its offset activities. |
| Evidence |
| No evidence found. |

| Question |
|--|
| 8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company has formal procedures in place to conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations. |
| Evidence |
| No evidence found. |

| Question |
|--|
| 8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company publishes any details of the offset agents, brokers or consultancy firms currently contracted to act with and on behalf of the company's offset programme. |
| Evidence |
| No evidence found. |

| Question |
|--|
| 8.4 Does the company publish details about the beneficiaries of its indirect offset projects? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company publishes any details of its indirect offset obligations or contracts. |
| Evidence |
| No evidence found. |

9. High Risk Markets

| Question |
|--|
| 9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption? |
| Score |
| 1 |
| Comments |
| <p>There is evidence that the company acknowledges the corruption risks associated with operating in different markets. The company indicates that it has a risk assessment procedure in place to account for business related risks, with clear risk management procedures in place. There is evidence that the results of these risk assessments have a direct impact on business decisions and inform the development and implementation of additional controls.</p> <p>However, the company receives a score of '1' because it does not provide examples of such possible controls. In addition, the publicly available evidence on risk management procedures is not explicitly related anti-bribery and corruption, instead focusing on 'business-related risks' more widely.</p> |
| Evidence |
| <p>[2] Mitsubishi Electric 2018 CSR Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/sites/GWS/en/sustainability/reports/pdf/2018/CSR_report_2018.pdf [p.51]</p> <p>Corruption Prevention (Preventing Bribery)</p> <div> <p>The Mitsubishi Electric Group takes measures to prevent bribery involving Japanese and overseas public officials, such as enhancing internal rules, providing employee education, requiring self-inspections, and conducting internal audits.</p> <p>We engage in Group-wide initiatives to prevent bribery. The "Mitsubishi Electric Group Anti-Bribery Policy" that was established on April 1, 2017 reiterates to people in and outside the Group our policy that, among other things, our Group companies, their officers and employees do not offer bribes and do not pursue profits that can be realized only by offering bribes.</p> <p> English version  Chinese version</p> </div> <div> <p>Additionally, e-learning programs are available to employees who have opportunities to interact with public officials within their duties at Mitsubishi Electric. Some 21,800 employees have taken these programs so far. Also implemented are face-to-face education that emphasizes practical issues and case studies intended for employees who frequently interact with foreign public officials. To date, the programs have attracted approximately 730 employees.</p> <p>In the light of the current global situation where anti-bribery regulations are becoming increasingly tighter, we will continue to enhance measures in each region, and take effective and efficient measures by selecting countries and transactions with particularly high risks of being involved in bribery, to respond to the expansion of our business at a global level.</p> </div> |
| <p>[5] Basic Policy Risk Management (Webpage) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/sustainability/csr/governance/risk/policy/index.html</p> <p>The Mitsubishi Electric Group engages in the development, manufacture and sale of a broad range of products in diverse sectors, including the Energy & Electric Systems, Industrial Automation Systems, Information & Communication Systems, Electronic Devices and Home Appliances. Moreover, the Group operates these businesses not only in Japan but overseas, such as in North America, Europe and Asia.</p> <p>To respond to the expectations of all stakeholders beginning with society, customers and shareholders, and to realize sustainable growth, the Group has a framework in place for managing business-related risks in an appropriate manner.</p> <p>The framework provides proper responses to risks depending on their type, size and impact. For example, by incorporating risk management into business activities, risks are managed according to the size and characteristics of each business, and important risks that cover the entire Group are mainly managed by corporate departments.</p> |

[6] Risk Management Framework (Webpage)

Accessed 22/07/2019

<https://www.mitsubishielectric.com/en/sustainability/csr/governance/risk/structure/index.html>

The Mitsubishi Electric Group maintains a multi-dimensional risk management system in which all executive officers participate.

Under this system, executive officers are responsible for risk management in their assigned areas of operation. In addition, executive officers exchange information and participate in important management initiatives and decisions through regularly scheduled executive officers' meetings.

In the event an incident occurs that seriously calls into question the Group's social responsibility and is expected to have a profound impact on management, or in the case of such emergencies as large-scale disasters, accidents or pandemics, a company-wide Emergency Response Center will be established to implement measures under the leadership of the president, to ensure prompt and proper initial response.

| Question | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|---|--|--|---------------|-----------------------------|-------------------------------|------------------------------------|--|---|--|--------------------------------------|---|---|--|--|--|--|--|---------------------------|--|--|--|
| 9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)? | | | | | | | | | | | | | | | | | | | | | | | |
| Score | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | | | | | | | | | | | | | | | | | | | | | | | |
| Comments | | | | | | | | | | | | | | | | | | | | | | | |
| <p>There is evidence that the company publishes a list of its consolidated subsidiaries and affiliates. Since this information is published in the company's Annual Report, there is evidence that this list is updated on an annual basis.</p> <p>However, the company receives a score of '1' because the list does not include joint ventures or the country of incorporation and operation for each entity.</p> | | | | | | | | | | | | | | | | | | | | | | | |
| Evidence | | | | | | | | | | | | | | | | | | | | | | | |
| <p>[9] Mitsubishi Electric 2019 Annual Report (Document) Accessed 22/07/2019 https://www.mitsubishielectric.com/en/investors/library/annual_report/pdf/ar2019.pdf [p.37]</p> | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Major Subsidiaries and Affiliates (As of March 31, 2019)</p> <table> <thead> <tr> <th></th><th>Manufacturing</th><th>Sales/Installation/Services</th><th>Comprehensive Sales Companies</th></tr> </thead> <tbody> <tr> <td>Energy and Electric Systems</td><td> <p>Toyo Electric Corporation</p> <p>Mitsubishi Electric Control Panel Corporation</p> <p>Mitsubishi Electric Power Products, Inc.</p> <p>Mitsubishi Electric Shanghai Electric Elevator Co., Ltd.</p> <p>Mitsubishi Elevator Asia Co., Ltd.</p> <p>Mitsubishi Elevator Korea Co., Ltd.</p> <p>Taiwan Mitsubishi Elevator Co., Ltd.</p> <p>Toshiba Mitsubishi Electric Industrial Systems Corporation</p> <p>Mitsubishi Hitachi Home Elevator Corporation</p> <p>Shanghai Mitsubishi Elevator Co., Ltd.</p> </td><td> <p>Mitsubishi Electric Building Techno-Service Co., Ltd.</p> <p>Mitsubishi Electric Plant Engineering Corporation</p> <p>Mitsubishi Electric Control Software Corporation</p> <p>Ryoden Elevator Construction, Ltd.</p> <p>Ryoko Co., Ltd.</p> <p>RYO-SA BUILDWARE Co., Ltd.</p> <p>Mitsubishi Elevator Hong Kong Co., Ltd.</p> <p>Mitsubishi Electric Saudi Ltd.</p> <p>Hitachi Mitsubishi Hydro Corporation</p> <p>AG MELCO Elevator Co. L.L.C.</p> </td><td></td></tr> <tr> <td>Industrial Automation Systems</td><td> <p>DBI Solko Co., Ltd.</p> <p>Mitsubishi Electric Automotive America, Inc.</p> <p>Mitsubishi Electric Thai Auto-Parts Co., Ltd.</p> <p>Mitsubishi Electric Automotive (China) Co., Ltd.</p> <p>Mitsubishi Electric Automotive de Mexico, S.A. de C.V.</p> <p>Mitsubishi Electric Automation Manufacturing (Changshu) Co., Ltd.</p> <p>Mitsubishi Electric Dalian Industrial Products Co., Ltd.</p> <p>Shizuki Electric Co., Inc.</p> <p>Nippon Injector Corporation</p> <p>Shihlin Electric & Engineering Corporation</p> </td><td> <p>Settsuyo Astec Corporation</p> <p>Ryowa Corporation</p> <p>Mitsubishi Electric Mechatronics Engineering Corporation</p> <p>Meldas System Engineering Corporation</p> <p>Mitsubishi Electric Mechatronics Software Corporation</p> <p>Mitsubishi Electric Automation (Hong Kong) Ltd.</p> <p>Mitsubishi Electric Automation Korea Co., Ltd.</p> <p>SETSUND ENTERPRISE CO., LTD.</p> </td><td></td></tr> <tr> <td>Information and Communication Systems</td><td> <p>Mitsubishi Electric TOKYO Systems Corporation</p> <p>Mitsubishi Precision Co., Ltd.</p> <p>SPC Electronics Corporation</p> <p>Seiyo Electric Co., Ltd.</p> <p>Miyoshi Electronics Corporation</p> </td><td> <p>Mitsubishi Electric Information Network Corporation</p> <p>Mitsubishi Electric Information Systems Corporation</p> <p>Mitsubishi Space Software Co., Ltd.</p> <p>Mitsubishi Electric Business Systems Co., Ltd.</p> <p>Mitsubishi Electric Micro-Computer Application Software Co., Ltd.</p> <p>Itec Hankyu Hanshin Co., Ltd.</p> </td><td> <p>Chiyoda Mitsubishi Electric Co., Ltd. and other regional comprehensive sales companies (9 companies)</p> <p>Mitsubishi Electric Europe B.V.</p> <p>Mitsubishi Electric US, Inc.</p> <p>Mitsubishi Electric & Electronics (Shanghai) Co., Ltd.</p> <p>Mitsubishi Electric (H.K.) 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[p.37 continued]

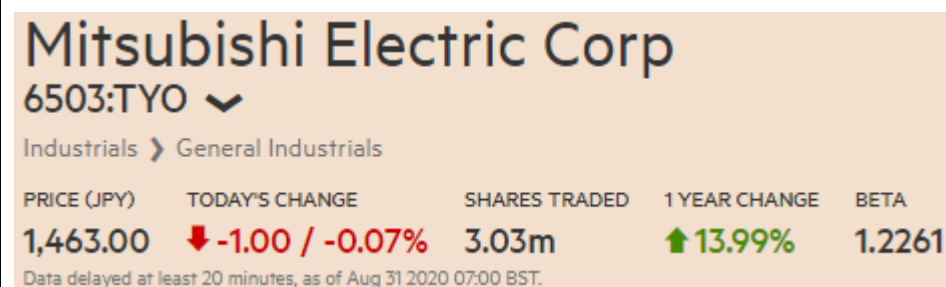
| | | | |
|----------------------------|---|--|--|
| <div>Home Appliances</div> | <div>Mitsubishi Electric Lighting Corporation Mitsubishi Electric Home Appliance Co., Ltd. Mitsubishi Electric Consumer Products (Thailand) Co., Ltd. Shanghai Mitsubishi Electric & Shangling Air-Conditioner and Electric Appliance Co., Ltd. Mitsubishi Electric (Guangzhou) Compressor Co., Ltd. Mitsubishi Electric Hydronics & IT Cooling Systems S.p.A. Siam Compressor Industry Co., Ltd. Mitsubishi Electric Air Conditioning Systems Europe Ltd.</div> <div>Kang Yong Electric Public Co., Ltd.</div> | <div>Mitsubishi Electric Living Environment Systems Corporation Mitsubishi Electric Life Network Co., Ltd. Mitsubishi Electric Air Conditioning & Refrigeration Equipment Sales Co., Ltd. Mitsubishi Electric Air Conditioning & Refrigeration Systems Co., Ltd. Meico Facilities Corporation Mitsubishi Electric Kang Yong Watana Co., Ltd. Mitsubishi Electric Air-Conditioning & Visual Information Systems (Shanghai) Ltd.</div> | |
| <div>Others</div> | | <div>Mitsubishi Electric Trading Corporation Mitsubishi Electric Engineering Co., Ltd. Mitsubishi Electric Logistics Corporation Mitsubishi Electric System & Service Co., Ltd. Mitsubishi Electric Life Service Corporation The Kodensha Co., Ltd. iPLANET Inc. Meico Trading (Thailand) Co., Ltd.</div> <div>Mitsubishi Electric Credit Corporation KITA KODENSHA Corporation</div> | |

Question**9.3 Does the company disclose its beneficial ownership and control structure?****Score****2****Comments**

There is evidence that the company is publicly listed on the Tokyo and London stock exchanges and is therefore required to disclose information on its beneficial ownership to the relevant bodies, so it is automatically awarded a score of '2'.

Evidence**[16] Financial Times Market Data – Mitsubishi Electric Corp**

Accessed 31/08/2020

<https://markets.ft.com/data/equities/tearsheet/summary?s=6503:TYO>
**[9] Mitsubishi Electric 2019 Annual Report (Document)**

Accessed 22/07/2019

https://www.mitsubishielectric.com/en/investors/library/annual_report/pdf/ar2019.pdf

[p.127]

Corporate Data / Shareholder Information (As of March 31, 2019)**Corporate Data**

Mitsubishi Electric Corporation
Tokyo Building, 2-7-3, Marunouchi,
Chiyoda-ku, Tokyo 100-8310, Japan
Tel: +81(3)3218-2111

Established: January 15, 1921
Paid-in Capital: ¥175,820 million
Shares issued: 2,147,201,551 shares
Employees: 145,817

Shareholders' Meeting

The annual meeting of shareholders of the Corporation is regularly held in June each year. Additionally, special shareholders meetings may be held as necessary.

Stock Exchange Listings

Japan: Tokyo
Europe: London

Major Shareholders

| | Number of Shares (thousands) | Percentage of Ownership |
|--|---------------------------------|----------------------------|
| The Master Trust Bank of Japan, Ltd. (Trust Account) | 162,251 | 7.6% |
| SSBTC CLIENT OMNIBUS ACCOUNT | 124,997 | 5.8% |
| Japan Trustee Services Bank, Ltd. (Trust Account) | 106,568 | 5.0% |
| Meiji Yasuda Life Insurance Company | 81,862 | 3.8% |
| Nippon Life Insurance Company | 61,639 | 2.9% |
| Mitsubishi Electric Group Employees Shareholding Union | 42,038 | 2.0% |
| Japan Trustee Services Bank, Ltd. (Trust Account 5) | 39,241 | 1.8% |
| Japan Trustee Services Bank, Ltd. (Trust Account 7) | 38,720 | 1.8% |
| Japan Trustee Services Bank, Ltd. (Trust Account 4) | 35,583 | 1.7% |
| JP MORGAN CHASE BANK 385632 | 32,653 | 1.5% |

Note: Shareholder ratio calculations deduct 425,622 company-owned shares.

Question

9.4 Does the company publish a percentage breakdown of its defence sales by customer?

Score

1

Comments

There is some evidence that the company publishes a percentage breakdown of its defence sales by customer. The company publishes a breakdown of its revenue from external customers by geographic region, which indicates that Japan accounts for approximately 58% of its sales. However, the company receives a score of '1' because its publicly available evidence indicates that these figures relate to overall sales rather than defence-specific sales.

Evidence

[9] Mitsubishi Electric 2019 Annual Report (Document)

Accessed 22/07/2019

https://www.mitsubishielectric.com/en/investors/library/annual_report/pdf/ar2019.pdf

[p.45]

RESULTS BY GEOGRAPHIC SEGMENT

Revenue from external customers by the location of customers

| Years ended March 31 | U.S. GAAP | | | | Yen (millions) | | U.S. dollars (thousands) |
|------------------------|-------------|-------------|-------------|-------------|----------------|--------------|-----------------------------|
| | 2015 | 2016 | 2017 | 2018 | IFRS 2018 | IFRS 2019 | IFRS 2019 |
| Japan | ¥ 2,512,357 | ¥ 2,521,194 | ¥ 2,405,552 | ¥ 2,423,626 | ¥ 2,438,942 | ¥ 2,556,644 | \$ 23,032,829 |
| North America | 398,501 | 447,578 | 422,259 | 417,423 | 419,121 | 429,451 | 3,868,928 |
| Asia (excluding Japan) | 959,540 | 963,684 | 940,150 | 1,075,683 | 1,089,176 | 1,013,883 | 9,134,081 |
| Europe | 360,668 | 369,978 | 384,075 | 431,316 | 431,316 | 453,748 | 4,087,820 |
| Others | 91,975 | 91,919 | 86,630 | 83,150 | 65,869 | 66,195 | 596,351 |
| Consolidated total | ¥ 4,323,041 | ¥ 4,394,353 | ¥ 4,238,666 | ¥ 4,431,198 | ¥ 4,444,424 | ¥ 4,519,921 | \$ 40,720,009 |

Japan

Revenue increased by 5% year on year to ¥2,556.6 billion primarily due to increases in the social infrastructure systems, automotive equipment and air conditioner businesses.

North America

Despite a decrease in the automotive equipment business, revenue increased by 2% year on year to ¥429.4 billion primarily due to increases in the social infrastructure systems, factory automation systems and air conditioner businesses.

Asia (excluding Japan)

Revenue decreased by 7% year on year to ¥1,013.8 billion primarily due to decreases in the factory automation systems, electronic devices and air conditioner businesses.

In China, revenue decreased by 11% year on year to ¥486.4 billion primarily due to decreases in the social infrastructure systems, electronic devices and air conditioner businesses.

Europe

Revenue increased by 5% year on year to ¥453.7 billion primarily due to increases in the social infrastructure systems, automotive equipment and air conditioner businesses.

Others

Revenue in other regions, including Oceania, was flat year on year at ¥66.1 billion.

10. State-Owned Enterprises (SOEs)

| Question |
|---|
| 10.1 Does the SOE publish a breakdown of its shareholder voting rights? |
| Score |
| N/A |
| Comments |
| N/A |
| Evidence |
| |

| Question |
|--|
| 10.2 Are the SOE's commercial and public policy objectives publicly available? |
| Score |
| N/A |
| Comments |
| N/A |
| Evidence |
| |

| Question |
|---|
| 10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process? |
| Score |
| N/A |
| Comments |
| N/A |
| Evidence |
| |

| Question |
|--|
| 10.4 Is the SOE's audit committee composed of a majority of independent directors? |
| Score |
| N/A |
| Comments |
| N/A |
| Evidence |
| |

| Question |
|---|
| 10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value? |
| Score |
| N/A |
| Comments |
| N/A |
| Evidence |
| |

List of Evidence & Sources

| No. | Type (Webpage or Document) | Name | Download Date | Link |
|-----|-------------------------------------|---|---------------|---|
| 01 | Document | Mitsubishi Electric Group Anti-bribery Policy | 22/07/2019 | https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/risks/pdf/Anti-BriberyPolicy_en.pdf |
| 02 | Document | Mitsubishi Electric 2018 CSR Report | 22/07/2019 | https://www.mitsubishielectric.com/sites/GWS/en/sustainability/reports/pdf/2018/CSR_report_2018.pdf |
| 03 | Webpage | System to ensure thorough implementation of compliance at global level | 22/07/2019 | https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/structure/index.html |
| 04 | Webpage | Directors & Executive Officers | 22/07/2019 | https://www.mitsubishielectric.com/en/about/organization/management/index.page |
| 05 | Webpage | Basic Policy Risk Management | 22/07/2019 | https://www.mitsubishielectric.com/en/sustainability/csr/governance/risk/policy/index.html |
| 06 | Webpage | Risk Management Framework | 22/07/2019 | https://www.mitsubishielectric.com/en/sustainability/csr/governance/risk/structure/index.html |
| 07 | Webpage | Compliance Audits | 22/07/2019 | https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/audits/index.html |
| 08 | Webpage | Initiatives against major compliance risks | 22/07/2019 | https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/risks/index.html |
| 09 | Document | Mitsubishi Electric 2019 Annual Report | 22/07/2019 | https://www.mitsubishielectric.com/en/investors/library/annual_report/pdf/ar2019.pdf |
| 10 | Webpage | Establishment of internal and external ethics and legal compliance hotlines | 22/07/2019 | https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/hotlines/index.html |
| 11 | Webpage | Thorough dissemination/education of our compliance policy | 22/07/2019 | https://www.mitsubishielectric.com/en/sustainability/csr/governance/compliance/education/index.html |
| 12 | Webpage | Purchasing Process | 22/07/2019 | https://www.mitsubishielectric.com/en/about/procurement/process/index.page |
| 13 | Webpage | CSR Procurement Policy | 22/07/2019 | https://www.mitsubishielectric.com/en/about/procurement/policy/index.page |
| 14 | Document | CSR Procurement Guidelines | 22/07/2019 | https://www.mitsubishielectric.com/en/about/procurement/green/downloads/pdf/CSR_English.pdf |
| 15 | Webpage | Management status of CSR issues | 09/08/2019 | http://www.mitsubishielectric.co.jp/corporate/csr/management/management/materiality_progress/index.html |
| 16 | Webpage | Financial Times Markets Data – Mitsubishi Electric Corp | 31/08/2020 | https://markets.ft.com/data/equities/tearsheet/summary?s=6503:TYO |