

mitsubishi power europe, ltd.

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Mitsubishi Power Europe, Ltd. (MPW-EUK) modern slavery and human trafficking statement for the financial year ending 31 March 2021 pursuant to section 54 of the Modern Slavery Act 2015. This statement has been approved by the board of directors of MPW-EUK. This statement is applicable to MPW-EUK and its subsidiaries and branches.

OUR BUSINESS, STRUCTURE AND SUPPLY CHAINS

MPW-EUK is a subsidiary of Mitsubishi Power, Ltd., one of the world's leading suppliers of equipment and services to the power generation market headquartered in Yokohama, Japan.

MPW-EUK is headquartered in London and provides a wide variety of products and services in the field of thermal power generation systems and environmental technology across Europe, the Middle East and Africa. MPW-EUK has branch offices in Italy, Ireland, Turkey, Netherlands, Spain, Tunisia, Germany and Poland and subsidiaries in Egypt, Romania, Germany and Nigeria.

The majority of the equipment, parts and components procured by MPW-EUK are from our Japanese parent company or from suppliers located in the European Union and consist of high value engineered parts. We have a limited need for mass produced components. To carry out maintenance services to meet customer requirements, MPW-EUK may procure third party labour services from both the European Union and other countries in which it operates.

Further details can be found at <https://emea.power.mhi.com>.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

MPW-EUK is committed to taking effective steps to assess, prevent and mitigate the risk of modern slavery in our operations and supply chains. We aim to be transparent about these steps and expect the same of our suppliers and contractors.

As reported in previous statements, we adopted by way of a board resolution, the Mitsubishi Heavy Industries (MHI) Group Global Code of Conduct. We adopted the MHI Code since MHI is the majority shareholder of our parent company. The Code prohibits the use of compulsory or forced labour and child labour and requires MPW-EUK to maintain a framework of fair and just remuneration, fair working hours and benefits.

The Code is available at: <https://www.mhi.com/company/aboutmhi/policy/conduct.html>.

We ensure consistent communication of the Group Global Code of Conduct throughout our business and management at all levels, via:

- direct and interactive communication to new employees on induction;
- e-learning/training for employees at MPW-EUK on UK law's Modern Slavery Act and related issues (for example in relation to supply chain risks) to explain their role and responsibility in helping to prevent modern slavery;

- Compliance messages included in communications distributed by the CEO;
- publication of the Code of Conduct on our internal and external websites; and
- requiring an annual declaration from each member of staff that they have read and understood the Code of Conduct.

DUE DILIGENCE PROCESSES

In order to identify and respond to modern slavery and human trafficking risks, we adopt a risk-based approach and have put in place the following processes:

- We identify, assess and continually monitor risk areas in our business and supply chains.
- We only work with reputable vendors selected and assessed in line with our supply chain due diligence procedures which include specific evaluations on modern slavery and human trafficking.
- To ensure that our employees know how to identify the warning signs of modern slavery and take appropriate action in response, we ensure that they receive focussed training on modern slavery in particular on the MHI Group Code of Conduct and Global Policies and Procedures in general. Further details are provided below under the heading "Training".
- We participate in group wide education and lectures to stay up to date on governmental requirements/guidance and specifically attended a special lecture relating to business and human rights in FY2020 to gain lessons learned from other group companies.
- We protect whistle blowers, including on issues related to modern slavery. This protection is communicated to all our employees through our employee handbook and through our website as part of our compliance statement. We use a system with Ethics Point (known as our whistleblowing hotline), an external service provider which allows the submission of issues and concerns completely anonymously. The creation and implementation of this system has been communicated to all our employees.
- Employees are also encouraged to raise any concerns or suspicions they may have regarding human rights or modern slavery abuses at the earliest opportunity to the Legal and Compliance Department.
- We ensure that any employee with a grievance, including in circumstances which might relate to modern slavery, is listened to and treated fairly, according to our workplace grievance mechanism. To ensure transparency and accessibility, this grievance mechanism is integrated into our Staff Handbook and sets out the process by which grievances are investigated and the protections which are offered to the employee.
- At the end of the year, MHI's EMEA Regional Audit team started a review of the contents of the FY19 Modern Slavery Act Statements issued by MPW-EUK. The objective of the audit is to ensure that the statements are valid and in compliance with the Act's requirements. The audit is scheduled to be concluded in the first quarter of 2021.

STEPS TO ASSESS AND MANAGE RISKS

Several functions in our organization support our measures to assess and manage modern slavery and human trafficking risks. These include amongst others:

- **Internal Control and Compliance**, through management of compliance policies and procedures, and review of key controls;
- **Risk Management**, through proactively identifying Corporate risks, including Compliance risks and that of Modern Slavery and Human Trafficking as applicable to our business;
- **MHI EMEA Regional Audit Team**, as the independent third line of defence within our company. The MHI EMEA Regional Audit team operates in accordance with the guidelines of the Institute of Internal Auditors UK & Ireland;
- **Legal**, through interaction with staff and management and external law firms and legal advisors, ensure that we remain at the forefront of changes in legislation and corporate requirements;
- **Human Resources**, through development of the relevant policies which cover our staff's interaction with internal and external parties. (E.g. Employee Handbook, Equal Opportunity policy and others); and
- **Quality/Supply Chain**, through the management of vendor due diligence and the assessment of vendor profile information questionnaires.

Our company has a flat organization structure with open communication. Employees are encouraged to discuss concerns with their supervisors without fear of repercussions. This structure allows us to identify issues quickly when they would occur.

TRAINING

To ensure that our staff understand and can identify modern slavery and human trafficking risks in our supply chains and business, we continue to develop and provide appropriate training. In particular, in the past twelve months, we have provided all field based staff, supply chain staff, and all levels of management including the CEO with access to an in-depth web training produced by an external expert law firm on modern slavery. The training seeks to raise awareness of the warning signs of modern slavery and how they might arise in the specific context of our operations and supply chain and to explain to staff their roles and responsibilities in helping to prevent modern slavery.

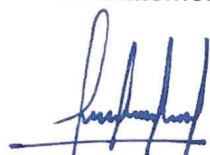
Additionally, our staff is required to complete MHI/MPW Compliance training sessions every year, including amongst others, training on MHI's Group Global Code of Conduct. We closely monitor the results of this training.

OUR EFFECTIVENESS IN ELIMINATING SLAVERY AND HUMAN TRAFFICKING

To promote the effectiveness of the steps outlined in this statement, during the last 12 months, MPW-EUK has taken further steps to foster a culture that promotes awareness of modern slavery

and how it can arise in the sectors in which we operate and purchase goods and services. We have continued to maintain and publicise a clear organisational policy and ethos which rewards the identification of risk and promotes an effective response.

This statement was approved by the board of directors of MPW-EUK on 23 August 2021.



Mr. Carlos Peton
Chief Executive Officer
Mitsubishi Power Europe, Ltd.