

Mitsubishi Power Europe GmbH Human Rights Commitment Statement

As a group company and subsidiary of Mitsubishi Heavy Industries, Ltd. (MHI), Mitsubishi Power Europe GmbH is fully bound to the MHI Group Global Code of Conduct (<https://www.mhi.com/company/aboutmhi/policy/conduct.html>). This policy defines standards to achieve a high level of integrity and ethic. It describes our values and principles of fair play that characterize our company and lay out what is considered as appropriate behaviour of our employees.

MHI as well as Mitsubishi Power as a worldwide operating companies are committed to respect human rights. Therefore, we as Mitsubishi Power Europe GmbH explicitly account for our responsibility to comply with human rights. It is our understanding that respecting and upholding human rights is our social and ethical duty and an important requirement for the sustainable development of our company. Throughout our business and beyond our company, including our suppliers, we recognize and ensure that the UN International Charta of Human Rights is respected, by embedding them in our policies. Through the long-standing membership of our ultimate group and parent company, MHI, in the UN Global Compact Initiative, we are naturally also committed to its global sustainable development goals for people and the planet.

Our employees, irrespective of whether our own or external employees are trained and made aware of Compliance on a regular basis - particularly in view of our own corporate policies as well as all relevant laws and regulations.

Human rights within our organization

1. Working conditions, health, safety

We offer our employees an adequate standard of living with our salaries and social security benefits. Our flexible working-hour model reflects the respect we accord to the right to rest and spare time, incl. paid leave as well as the right to family life, which also covers parental leave or temporary reduction of working hours. This allows for a better balance of professional with personal or family lives.

The safety of our employees, partners, neighbours and construction sites, transports as well as products has always been and continues to be our priority. We analyse all our activities regarding possible weaknesses and their impact on the safety of people and the environment. We ensure a high level of quality, health, safety and environment protection (QHSE) at our locations. QHSE rules are strictly adhered to and continuously improved, in order to minimize and avoid the occurrence of near misses, accidents and incidents. Experts in workplace safety support the management at all levels by introducing adequate measures to prevent diseases and accidents.

2. Diversity and inclusion

Equal treatment of all employees is a crucial principle of our corporate policy.

In accordance with the prevailing law no one shall be disadvantaged, discriminated or given preferential treatment because of their descent, age, gender, physical characteristics, social background, disability, union membership, beliefs, marital status, sexual orientation, pregnancy or any other characteristic.

Harassment of any kind is prohibited. We expect our employees to be respectful, professional and fair in dealing with themselves, customers, suppliers, officials as well as any third party.

3. Forced and child labour

Any kind of forced and child labour is forbidden. We follow a clear policy of “zero tolerance“ for child labour throughout our global business operations. We comply with all laws and regulations in force on working time and paid leaves.

We will not tolerate modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to ensure there is transparency in our business and to tackle any modern slavery and human trafficking in our supply chain. We expect the same standards from our suppliers and clients.

Our Code of Conduct prohibits the use of compulsory or forced labour and child labour, and requires us to maintain a framework of fair and just remuneration, fair working hours and benefits.

4. Supplier Code of Conduct

Based on this, we created our own Code of Conduct for Suppliers & Service Providers (Supplier Code of Conduct), which is communicated to all our employees, suppliers and service providers and is available on our company homepage for their reference. Regularly we remind our suppliers and service providers on the requirements to comply with our policies and to respect Compliance topics in general as well as specifically human rights, also along their own supply chains.

We work with our suppliers and our clients, to ensure that we apply common standards and philosophies to help the eradication of modern slavery and human trafficking.

We ensure consistent messaging of the MHI Group Global Code of Conduct, as well as of our Supplier Code of Conduct, throughout our business and management at all levels, as well as communicating our expectations to our supply chain.

Human rights in regards to our business partners

We consider our business partners as an extension of our own company. The objective of our cooperation with our business partners is to build long-term, sustainable and trustful business relationships and minimize risks through responsible conduct. Basis for cooperation are our principles that are clearly described within the global Code of Conduct of MHI, which is

supplemented by our Supplier Code of Conduct. Human right issues considered in the Code of Conduct refer to key aspects of ethics, treatment of employees, quality, health protection, safety and environmental protection.

The MHI Group Global Code of Conduct can be retrieved via following link:

<https://www.mhi.com/company/aboutmhi/policy/conduct.html>

Our Supplier Code of Conduct is available at our company homepage via the following link:

<https://power.mhi.com/regions/emea/suppliers>

1. Suppliers

To the extent of their area of responsibilities, Mitsubishi Power Europe GmbH expects each supplier to enforce and comply with high ethical standards and a conduct towards their employees to be impeccably responsible and ethical. Moreover, we expect our suppliers to require their own suppliers to comply with these standards.

As part of the various regulations at national and international level on supply chain compliance, we continuously analyse our suppliers' risks in this regard and implement appropriate countermeasures. Amongst others, as the vast majority of our suppliers is located in Germany and EU countries with high standards of human rights compliance, we assume that the risk potential for our company (including subsidiaries) is rather low.

We are committed that delivered products are manufactured in a responsible manner. We monitor the implementation and Compliance with the requirements of our Codes of Conduct by assessments and audits of our suppliers.

2. Customers

Our commitment to sustainability includes our objective to protect the health and safety of any individual that comes into direct contact with our products. We evaluate possible health and environmental risks throughout the life-cycle, from research & development or engineering and planning to manufacturing up to commissioning and hand-over to the customer.

We do not tolerate any violations of the law in product marketing. Our marketing is responsible and fully consistent with high ethical and moral principles.

Human rights and corporate social responsibility

As part of our extensive social commitment we contribute to science and education, charitable and social projects.

Further information on Corporate Social Responsibility can be retrieved via the following link:

<https://power.mhi.com/regions/emea/company/corporate-social-reponsibility>

Complaint mechanisms

Various Compliance functions at group and company level define in-house standards to ensure Compliance with legislation, with internal and external regulations and with the guidelines of the Code of Conduct. In summary, the activities fall into the categories prevention, detection and reaction.

Mitsubishi Power Europe GmbH provides various (also anonymous) and global communication channels for information on and reporting of possible violation of Compliance requirements.

If violations are caused by our business operations, we will immediately initiate appropriate remedial measures.

Further information on Compliance and complaints mechanisms can be retrieved via the following link:

<https://power.mhi.com/regions/emea/company/compliance>

Responsibilities

Our internal and external employees are expected to strictly comply with laws and our in-house policies.

Our executive managers serve as role models and are specifically responsible to meet the requirements in the daily business. Therefore, to the extent of their area of responsibilities, they are strongly urged to address and implement human rights and ethical conduct together with their team within our company.

In case of doubt or if there are any questions with respect to give effect to the principles of this statement, internal and external employees are invited to contact their superiors and the Compliance Officer. Questions by external parties can be addressed to the Compliance Officer.

Duisburg, 2 May 2019 (Revision 28 March 2024)