



MITSUBISHI ELECTRIC AUSTRALIA MODERN SLAVERY STATEMENT FY2025

TABLE OF CONTENTS

TABLE OF CONTENTS	2
MESSAGE FROM OUR MANAGING DIRECTOR	3
1. INTRODUCTION	4
2. STRUCTURE, OPERATIONS AND SUPPLY CHAIN	4
2.1 Mitsubishi Electric Australia structure	4
2.2 Mitsubishi Electric Australia operations	4
2.3 The Mitsubishi Electric Australia supply chain	5
3. MODERN SLAVERY RISKS IN COMPANY OPERATIONS AND SUPPLY CHAINS	6
3.1 Mitsubishi Electric Australia's supply chain	6
4. ACTION TAKEN TO ASSESS AND ADDRESS OUR MODERN SLAVERY RISKS	7
4.1 Policies and guidelines of Mitsubishi Electric Australia	7
4.2 How Mitsubishi Electric Australia assesses and addresses modern slavery risks	7
4.3 How MELCO assesses and address modern slavery risks in the Mitsubishi Electric Group Supply Chain	9
5. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS	10
Appendix: Mandatory criteria under the <i>Modern Slavery Act 2018</i> (Cth)	11

MESSAGE FROM OUR MANAGING DIRECTOR

On behalf of the Board of Directors of Mitsubishi Electric Australia, I am pleased to present our sixth modern slavery statement for the financial year ending 31 March 2025.

The Mitsubishi Electric Group has a long history of commitment to supporting human rights. This is embedded in the Mitsubishi Electric Corporate Philosophy, in particular our values of Humanity and Society. This commitment has been enhanced through our membership of the UN Global Compact and our parent company's membership with the Responsible Business Alliance.

Mitsubishi Electric Australia is committed to respecting, promoting, and protecting human rights and taking steps to address human rights abuses and modern slavery in our operations and supply chain. We are aligned with the objectives and activities of our parent company in this regard and demonstrate this through our ongoing engagement as a member of the Australian Chapter of the UN Global Compact.

This sixth modern slavery statement reaffirms our commitment to actionable change and outlines the measures that we are taking to monitor and address the risks of Modern Slavery.



Jeremy Needham

Managing Director, Mitsubishi Electric Australia

This modern slavery statement was approved by the Board of Directors of Mitsubishi Electric Australia on 7 August 2025.

1. INTRODUCTION

Mitsubishi Electric Australia Pty Ltd (ABN 58 001 215 792) (**Mitsubishi Electric Australia**) is committed to respecting, promoting and protecting human rights. It is committed to taking steps to address human rights abuses and the occurrence of modern slavery in its operations and supply chain.

Mitsubishi Electric Australia is part of the Mitsubishi Electric Corporation group of companies (**Mitsubishi Electric Group**). Respect for and the protection of human rights has long been part of Mitsubishi Electric Group's approach to doing business across the globe. This business philosophy is embedded in the Mitsubishi Electric Group Purpose and Values. The values of Society and Humanity confirm Mitsubishi Electric Australia's commitment to contributing to the development of a better society as a good corporate citizen, to prioritising health and safety, to the promotion of biodiversity and the respect for human rights.

This modern slavery statement (**Statement**) has been prepared by Mitsubishi Electric Australia in compliance with the requirements of the Australian *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). It explains the actions Mitsubishi Electric Australia has taken to assess and address modern slavery risk exposures in its operations and supply chains during its financial year ended 31 March 2025 (**FY2025**) (**Reporting Period**).

Mitsubishi Electric Australia is the sole reporting entity covered by this Statement. Mitsubishi Electric Australia does not own or control any other entities

2. MITSUBISHI ELECTRIC AUSTRALIA STRUCTURE, OPERATIONS AND SUPPLY CHAIN

2.1 Mitsubishi Electric Australia structure

Mitsubishi Electric Australia's ultimate holding company is Mitsubishi Electric Corporation (**MELCO**), a public company headquartered in Tokyo, Japan and listed on the Tokyo Stock Exchange (TYO:6503). MELCO is a global leader in the manufacture, marketing and sale of electrical and electronic equipment used in cooling and heating, consumer electronics, home appliances, information processing and communications, space development and satellite communications, defence, industrial technology, energy, power systems, transportation and building equipment.

Mitsubishi Electric Australia's shares are partly held by MELCO and partly held by Mitsubishi Electric Asia Pacific (**MEAP**), which is also a subsidiary of MELCO.

2.2 Mitsubishi Electric Australia operations

Mitsubishi Electric Australia, is headquartered in Sydney, New South Wales, Australia. It supplies Mitsubishi Electric products and solutions in Australia, ranging from cooling, heating and air treatment systems, to home appliances, transportation and heavy engineering, power, automotive and automation systems.

Mitsubishi Electric Australia has offices across New South Wales, Victoria, Queensland, South Australia, Western Australia and the Australian Capital Territory. Mitsubishi Electric Australia also operates a factory facility, which is situated adjacent to its headquarters. This factory provides assembly, testing and maintenance services for power and railway systems. Other relevant operational information includes the following:

- The business has operated in Australia for over 50 years;
- FY2024/25 Actual Sales: AUD 572.5 million; and
- Total number of employees: 316 (as at March 2025).

Mitsubishi Electric Australia's core operations comprise:

- **cooling and heating and home appliances divisions**, which conducts:
 - the importation of finished goods and spare parts from entities within the Mitsubishi Electric Group, as well as complimentary products from other suppliers;
 - the distribution of products, via third party providers, of transport and warehousing services; and
 - the marketing, sale and service, through distributors, dealers, retailers and contractors, of air-conditioning units, refrigerators, air-purifiers and jet towels.
- **railway systems and power divisions**, which conducts:
 - the importation of finished goods and spare parts from entities within the Mitsubishi Electric Group, as well as complimentary products from other suppliers;
 - the assembly, testing and maintenance of products within the factory in Sydney, New South Wales; and
 - the marketing and sale, directly to government and contractors of railway systems (traction, auxiliary power supply, air-conditioning, train management systems and communications systems) and power products (high voltage switchgear).
- **industrial automation, automotive and building management systems divisions**, which conducts:
 - the importation of finished goods and spare parts from entities within the Mitsubishi Electric Group, as well as complimentary products from other suppliers;
 - the distribution and warehousing of products from the facility located at its headquarters, in New South Wales; and
 - the marketing, sale and service through distributors and contractors of industrial automation (SCADA, PLCs, robots, servos and drives), automotive parts (starter motors, alternators) and building management systems.

Mitsubishi Electric Australia's parent company, MELCO, oversees product research and development, which is undertaken primarily in Japan.

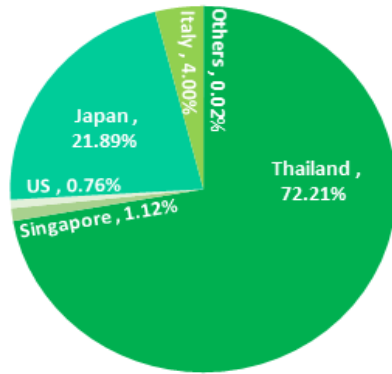
2.3 The Mitsubishi Electric Australia supply chain

Mitsubishi Electric Australia's supply chains include:

- **cooling and heating and home appliances divisions**: the products are manufactured at factories operated by other Mitsubishi Electric Group entities, primarily located in Thailand, Italy and Japan. Any final assembly, installation and commissioning work required is undertaken by Mitsubishi Electric Australia local workers in Australia;
- **railway systems and power divisions**: the products are manufactured at factories operated by other Mitsubishi Electric Group entities, primarily located in Japan and in Pittsburgh, USA. Mitsubishi Electric Australia also purchases parts from other suppliers in Europe, Taiwan, China and New Zealand. Final assembly, installation and commissioning work required is undertaken at the factory in Sydney, New South Wales, as well as by field technicians in Australia; and
- **other divisions**: the majority of the finished goods and components are sourced from suppliers within the Mitsubishi Electric Group, located in Japan, Singapore and the United States. These goods and components are sold to distributors and contractors.

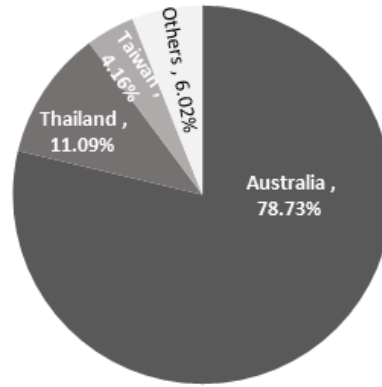
Mitsubishi Electric Australia also engages with suppliers who provide goods and services which are essential to supporting local operations. This includes areas such as transport logistics and warehousing, cleaning and maintenance services, security, marketing, IT solutions, travel arrangements and professional services.

Mitsubishi Electric Australia sources goods and services both domestically and internationally. A significant portion of the purchases made by Mitsubishi Electric Australia in the ordinary course of business come from overseas suppliers, many of which are part of the Mitsubishi Electric Group. Across the FY2025 Reporting Period, Mitsubishi Electric Australia, purchased goods from suppliers located in the countries illustrated below:



*Mitsubishi Electric Group companies:
Total spend in FY2025: ~ \$409 million*

Others (0.04%) includes Germany 0.013% and the United Kingdom 0.002%*



*Non-Mitsubishi Electric Group companies: Total spend in F2025:
~\$102 million*

**Others (6.02%) includes Japan 0.1%, United States 1.8%, Singapore 0.2%, New Zealand 1.1%, France 0.9%, Germany 0.5%, Iceland 0.05%, Spain 0.4%, Hong Kong 0.2%, United Kingdom 0.1%, Malta 0.1%, Norway 0.1%, Ireland 0.1%, Peoples Republic of China 0.10%*

3. MODERN SLAVERY RISKS IN MITSUBISHI ELECTRIC AUSTRALIA OPERATIONS AND SUPPLY CHAINS

3.1 Mitsubishi Electric Australia's supply chain

As noted in section 2.3, the Mitsubishi Electric Australia supply chain includes both domestic and overseas suppliers. Approximately 80% of all purchases by Mitsubishi Electric Australia are made through the Mitsubishi Electric Group, meaning those purchases are subject to MELCO's compliance regime and oversight. The majority of those purchases are sourced from MELCO's subsidiary in Thailand.

Mitsubishi Electric Australia suppliers which are external to the Mitsubishi Electric Group, undergo appropriate due diligence checks before engagement, including a surveying and risk assessment process for those supplying to Mitsubishi Electric Australia on a continual basis. Mitsubishi Electric Australia remains aware of the modern slavery risks present in the overseas jurisdictions with which it deals. It notes in particular that, according to the Global Slavery Index, the risks of modern slavery occurrence in supply chains are higher in countries located in certain parts of Asia and the Pacific Region.

Mitsubishi Electric Australia is also aware of the industries in which it operates in, particularly with the sourcing and manufacturing of electrical, electronic and mechanical components for HVAC and railways products. These sectors have been associated with a heightened risk of the occurrence of modern slavery.

In addition, Mitsubishi Electric Australia's reliance on multi-tiered supply chains may introduce additional layers of complexity for monitoring and addressing modern slavery risks. In some circumstances, Mitsubishi Electric Australia may lack visibility in the practices of suppliers in secondary and others tiers of the supply chain and with the sources of materials. However, Mitsubishi Electric Australia is committed to proactively monitoring and addressing these risks. Over the past reporting periods, there has also been a steady maturing of the business' understanding of Modern Slavery risks, which are unique to Mitsubishi Electric Australia's local supply chain and operations, independent from Mitsubishi Electric Group.

4. ACTION TAKEN TO ASSESS AND ADDRESS OUR MODERN SLAVERY RISKS

4.1 Policies and guidelines of Mitsubishi Electric Australia

Mitsubishi Electric Australia's commitment to prevent the occurrence of modern slavery in operations and supply chains, is underpinned by the policies and guidelines that it and MELCO collectively have in place.

Mitsubishi Electric Australia's Human Rights Policy

Mitsubishi Electric Australia's Human Rights Policy aims to support and align with the Mitsubishi Electric Group's Human Rights Policy, and to support the implementation of key human rights initiatives within Australia. Mitsubishi Electric Australia's Human Rights Policy is a formal commitment to recognise and uphold its responsibility to respect human rights and preserve the rights of those who directly and indirectly contribute to Mitsubishi Electric Australia's operations and supply chains. It applies to all Mitsubishi Electric Australia suppliers, customers and other business partners, and serves to educate Mitsubishi Electric Australia's stakeholders on its priorities.

Other Mitsubishi Electric Australia Policies

In addition, Mitsubishi Electric Australia has adopted the following internal policies and guidelines which are relevant in ensuring ethical practices within operations and supply chain:

- Mitsubishi Electric Australia's Whistleblower Policy;
- Vendor Application Form; and
- Vendor Application Business Declaration Checklist.

Mitsubishi Electric Group Policies

MELCO's Corporate Ethics and Compliance Statement requires all executives and members of the Mitsubishi Electric Group to conduct themselves with respect for human rights at all times. MELCO has implemented the following policies and guidelines for respecting human rights, which apply to all Mitsubishi Electric Group entities (including Mitsubishi Electric Australia):

- **Mitsubishi Electric Group Code of Conduct:** applies to all officers and employees of the Mitsubishi Electric Group, and reflects the group's commitment to:
 - the prohibition on forced labour and child labour; and
 - compliance with labour-related laws and regulations as well as the work rules of each country and region.
- **Mitsubishi Electric Group Human Rights Policy:** sets out the Mitsubishi Electric Group's initiatives for the respect of human rights based on international norms. The policy was revised in August 2024 (during the FY25 Reporting Period) with guidance from human rights experts from Japan (namely Mori Hamada & Matsumoto) and abroad (namely Pillar Two). The policy requires respect for human rights by the Mitsubishi Electric Group employees, its customers, consumers and local communities.
- **Mitsubishi Electric Group Supply Chain Code of Conduct:** was established in line with the provisions of the Responsible Business Alliance (RBA) Code of Conduct. The RBA, which MELCO became a member of in 2022, is the world's largest industry coalition dedicated to responsible business conduct in global supply chains. This Supply Chain Code of Conduct aims to give Mitsubishi Electric Group's suppliers, a deeper understanding of the group's attitudes toward sustainable procurement and the Group's expectations regarding their compliance efforts.

4.2 How Mitsubishi Electric Australia assesses and addresses modern slavery risks

Mitsubishi Electric Australia identifies, assesses, monitors and controls modern slavery risks in its operations and supply chains through the following initiatives and activities:

- **UNGCA membership:** Mitsubishi Electric Australia is a member of the Australian Chapter of the UN Global Compact (**UNGCA**). Mitsubishi Electric Australia remains committed to continued engagement with the UNGCA and seeks to become more invested with involvement in outreach activities and awareness-raising initiatives in future;
- **Governance and compliance:** Mitsubishi Electric Australia's response to modern slavery is headed by the Chief Compliance Officer and supported by other divisions within the business, including Legal, Finance, Internal Audit, Human Resources and Procurement.
- **Workforce:** Mitsubishi Electric Australia conducts appropriate background checks to ensure that all prospective employees have the right to work in Australia. There are also controls and processes in place to ensure that employees are paid in line with, or above the relevant Modern Awards applicable to the business;
- **Training and education:** Mitsubishi Electric Australia employees receive specific training on modern slavery. This includes the requirements of the Group Code of Conduct and how to identify and report potential or actual breaches of the Modern Slavery Act.

On 10 December each year, the Mitsubishi Electric Group observes Human Rights Day. This promotes awareness of Modern Slavery risks within the group and provides updates on the initiatives implemented at group level to combat forced labour and child labour.

- **Contracts:** Mitsubishi Electric Australia's standard procurement contracts expressly require suppliers to take reasonable steps to identify, assess and address risks of modern slavery practices in the operations and supply chains used in the provision of goods and services. Suppliers must, as soon as reasonably practicable after they become aware of any modern slavery practices, take all reasonable actions to address or remove these practices. They must also promptly respond to reasonable information requests and inquiries from Mitsubishi Electric Australia in relation to their modern slavery risks and exposure.

Mitsubishi Electric Australia's standard terms of supply and procurement also require all counterparties to comply with all applicable laws, including the Modern Slavery Act.

- **Supplier due diligence and screening:** Mitsubishi Electric Australia conducts initial desktop assessments of prospective suppliers for modern slavery, anti-bribery and anti-money laundering and other unlawful activities. Ongoing supplier due diligence is conducted through Supplier Questionnaires for suppliers assessed by Mitsubishi Electric Australia to be operating in high-risk areas. Within the Reporting Period, Mitsubishi Electric Australia continued to improve this process by including a Modern Slavery Questionnaire in its Vendor Application Form.
- **Supplier engagement and remediation:** In the FY2025 Reporting Period, Mitsubishi Electric Australia prioritised key areas for the possible occurrence of modern slavery to be addressed with suppliers in the facilities management and security industries.

Accordingly, in the Reporting Period, Mitsubishi Electric Australia further engaged with suppliers in the above listed industries, to gain additional transparency of the measures they each had in place to manage risk and prevent the occurrence of Modern Slavery within their own supply chains and to ensure that binding contracts which included robust Modern Slavery requirements, had been entered into.

- **Coordination of Initiatives with MELCO**

In February 2025, Mitsubishi Electric Australia met with the MELCO Corporate Sustainability Division in Japan to share ideas, resources and examples of how modern slavery activities are being managed within the various Mitsubishi Electric Group companies, and the jurisdictions in which they operate. The meeting was an opportunity for Mitsubishi Electric Australia to identify areas for growth in its local Modern Slavery activities and to consider how it may continue

increasing employee and supplier engagement with human rights issues, in its day-to-day business operations.

4.3 How MELCO assesses and address modern slavery risks in the Mitsubishi Electric Group Supply Chain

MELCO further identifies, assesses, monitors and controls modern slavery risks in operations and supply chains through undertaking the following human rights initiatives and activities:

- **Human Rights Subcommittee:** MELCO's Human Rights Subcommittee was established in FY2023. It continues its responsibility for reviewing human rights initiatives and resolving issues. Meetings of the Subcommittee were convened on 3 occasions during the Reporting Period;
- **Human Rights Working Group:** Initiatives of the Human Rights Subcommittee are implemented by the Human Rights Working Group. Meetings of the Working Group were convened on 10 occasions during the Reporting Period;
- **Sustainability Innovation Group:** On 1 April 2024, MELCO established the Sustainability Innovation Group. The Sustainability Innovation Group aims to accelerate the Mitsubishi Electric Group's sustainability management on a global level by creating "Trade-On (mutual benefits)" businesses that simultaneously solve social challenges and grow the business.
- **Policies for Responsible Minerals Procurement:** MELCO continues to seek transparency in its supply chain to avoid any affiliation with armed groups that trade in conflict minerals. During the Reporting Period, supplier surveys were conducted to determine the current level of compliance among smelters, with the Responsible Minerals Assurance Process (**RMAP**). Ascertaining RMAP compliance levels, assists MELCO to make informed choices about procurement of responsibly sourced minerals in its supply chains. The Mitsubishi Electric Group continues to promote RMAP compliance among smelters through industry activities;
- **Grievance Mechanism:** the Mitsubishi Electric Group accepts inquiries from all stakeholders (employees, business partners, customers, consumers, local residents etc) all days of the year through two Human Rights Contact Desks worldwide. These consist of an internal desk, available at the MELCO official global website and an external desk available through the Japan Centre for Engagement and Remedy on Business and Human Rights (JaCer). Relevant departments promptly investigate the facts pertaining to each complaint. If the investigation finds any act of human rights violation in the value chain of the Mitsubishi Electric Group, appropriate actions are taken including providing/requiring remedy to the victim, and disciplining the offending party in accordance with the UNCP;
- **Foreign Technical Intern Trainees:** MELCO surveys subcontractor factories to ensure there are no infringements of the Japanese Technical Intern Training Act and that interns are being correctly remunerated and are not subject to exploitation. MELCO provides guidance to its subcontractors on areas for improvement and promotes activities for preventing the violation of human rights of foreign technical intern trainees;
- **Human Rights Due Diligence:** The Mitsubishi Electric Group is a member of the RBA with the aim of building a responsible value chain. The key management tools include the following:
 - **Human Rights Impact Assessment:** during the previous reporting period, MELCO conducted a Human Rights Impact Assessment in collaboration with Business for Social Responsibility (**BSR**). As part of that process, BSR presented 86 recommendations for the Mitsubishi Electric Group's corporate activities (including supply chain) as proposed measures to prevent the occurrence of the 21 human rights risks which were identified in the Impact Assessment. In FY2025, 46 of the 86

recommendations have been initiated. MELCO is working to have all recommendations implemented within FY2026/2027.

- **Self-Assessment Questionnaire (SAQ) – MELCO Manufacturing Sites:** In FY2025, MELCO continued its annual RBA SAQ at all sixteen of its domestic manufacturing sites to confirm that the risk of forced labour, child labour and modern slavery is being reduced. In FY2025, the risk of Modern Slavery at all 16 sites was determined to be “medium” and it was confirmed that there was no use of forced labour or child labour at those 16 sites. MELCO intends to expand the SAQ to include Mitsubishi Electric Group companies in Japan and overseas.
- **Self Assessment Questionnaire (SAQ) Supply Chain** – During the Reporting Period, an SAQ was sent to 500 of MELCO’s suppliers located in Japan (which represent the top 80% of MELCO’s suppliers determined by purchase amounts), for completion. 50% of those suppliers completed and returned the SAQ. No cases of forced labour or child labour were identified in relation to those respondents. During the next Reporting Period, MELCO plans to roll out the SAQ to overseas suppliers and to ensure that items which explicitly address reductions in excessive working hours and the right to minimum wages, are reflected in the RBA SAQ.
- **Mitsubishi Electric Group Supply Chain Code of Conduct:** In FY2025, the Mitsubishi Electric Group Supply Chain Code of Conduct was distributed to approximately 500 companies and of those companies, 80% agreed to comply with the Code of Conduct.
- **Validated Assessment Program (VAP):** The VAP consists of an audit to be conducted by accredited third-party auditors and in accordance with the RBA Code of Conduct.

5. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Mitsubishi Electric Australia is committed to monitoring the effectiveness of its processes and procedures to address the modern slavery risks present in operations and supply chains. The business continues its membership with the Australian Chapter of the UN Global Compact, which provides a forum through which Mitsubishi Electric Australia can discuss, test and reflect on processes and efforts to improve measures to combat the occurrence of modern slavery.

Mitsubishi Electric Australia continually assesses the effectiveness of its actions in identifying and managing modern slavery risks by specifically:

- tracking actions and outcomes, including through surveys;
- engaging with suppliers and other external partners regarding their human rights initiatives in their operations and supply chain;
- engaging with the MELCO Corporate Sustainability Division regarding the effectiveness of MELCO’s activities in relation to human rights and modern slavery; and
- undertaking regular internal governance and external assurance processes.

Appendix: Mandatory criteria under the *Modern Slavery Act 2018* (Cth)

Section of the Act	Criteria	Where the criteria is addressed in this Statement
16(1)(a)	The Statement must identify the reporting entity.	1. <i>Introduction</i> , page 4
16(1)(b)	The Statement must describe the structure, operations and supply chains of the reporting entity.	3.1. <i>Our structure</i> , page 4 3.2. <i>Our operations</i> , page 4 3.3. <i>Our supply chains</i> , page 5
16(1)(c)	The Statement must describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	4. <i>Modern Slavery Risks in Our Operations and Supply Chains</i> , page 6
16(1)(d)	The Statement must describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	5. <i>Actions Taken to Assess and Address Our Modern Slavery Risks</i> , page 7
16(1)(e)	The Statement must describe how the reporting entity assesses the effectiveness of such actions.	6. <i>Assessing the Effectiveness of Our Actions</i> , page 10
16(1)(f)	The Statement must describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14 — the entity giving the statement.	Not applicable to this Statement – Mitsubishi Electric Australia does not own or control any entities, and is not issuing a joint modern slavery statement
16(1)(g)	The Statement must include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Please refer to the contents of this Statement
13(2)(c)	The Statement must be approved by the principal governing body of the entity.	<i>Message from our Managing Director</i> , page 3
13(2)(d)	The Statement must be signed by a responsible member of the entity.	<i>Message from our Managing Director</i> , page 3