



## **Modern Slavery Statement for FY2021**

This statement is made by Mitsui O.S.K. Lines, Ltd. (MOL) and MOL (EUROPE AFRICA) LTD. (MOLEA) pursuant to Section 54(1) of the UK Modern Slavery Act 2015, for the fiscal year 2021 with the approval of the Board of Directors of MOL and that of MOLEA. MOL and its group companies, including MOLEA, are referred to as the "MOL Group".

### **1. Corporate Profile**

#### MOL

MOL, founded in 1884 and headquartered in Tokyo, operates through offices in 53 countries and territories and had 500 consolidated companies and 8,547 consolidated employees as at 31 March 2022.

For more information on our corporate organizational structure and corporate profile, please visit our website.

<https://www.mol.co.jp/en/corporate/organization/index.html>

<https://www.mol.co.jp/en/corporate/profile/index.html>

#### MOLEA

MOLEA was established in 1989 as a wholly-owned subsidiary of MOL and is based in London. It operated mainly in Europe and Africa and had 85 employees as at 31 December 2021.

### **2. MOL's Business**

The MOL Group is engaged in various lines of business including ocean shipping (being the core business of the MOL Group), a variety of social infrastructure businesses around the world such as offshore business, wind power energy business, terminal and logistics business, as well as real estate and cruise ship business, under the MOL Group Corporate Mission of "From the blue oceans, we sustain people's lives and ensure a prosperous future".

For more information on the MOL Group businesses, please visit our website.

<https://www.mol.co.jp/en/services/index.html>

### **3. Value Chains**

In ocean shipping, the core of MOL group's lines of business, we create value chains with various business partners covering various activities from the design, construction and procurement of ships to the procurement of bunker oil and ship supplies, as well as cargo handling and operations at ports, and the maintenance and scrapping of ships.

In working to develop business with such various business partners in these value chains, the MOL Group strives to ensure appropriate conduct and establish fair relationships based on various policies as described below.

For more information on our procurement policy, please visit our website.

<https://mol.disclosure.site/en/themes/232>

### **4. Policies on Prevention of Forced or Compulsory Labor or Human Trafficking**

MOL and MOLEA do not tolerate any forced or compulsory labor, human trafficking, or any other form of modern slavery whatsoever for the MOL Group and throughout its value chains, based on the following policies:

#### Human Rights Policy

The MOL Group recognizes that respect for human rights should be a priority in all business activities, and in March 2021, the MOL Group Human Rights Policy was formulated to clarify the Group's stance on respect for human rights.

The policy states that the MOL Group respects the United Nations Guiding Principles on Business and Human Rights and the ten principles in four fields set forth in the United Nations Global Compact, in which it was the first Japanese shipping company to participate in 2005. The MOL Group also respects the human rights stipulated within the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for the Conduct of Multinational Enterprises and the Maritime Labor Convention 2006, which stipulates the basic labor rights of seafarers, and so on.

In addition, the MOL Group expects all business partners, involved in our business activities to support this policy.

The MOL Group will respect for human rights in business activities and promote efforts to respect human rights while engaging in dialogue with stakeholders, thereby contributing to realizing a sustainable global society.

For more information on the MOL Group human rights policy, please visit our website.  
<https://mol.disclosure.site/en/themes/233>

#### Rules of Conduct

MOL sets forth "Rules of Conduct," with which executives and employees must comply, to improve the company businesses by realizing better work environments, and to continually increase corporate value while gaining the understanding and cooperation of various stakeholders.

The MOL rules of conduct are available at our website.  
<https://mol.disclosure.site/en/themes/191>

Under "2. Respect human rights and refuse to permit discrimination and harassment" in these "Rules of Conduct," MOL strives to modify labor practices that infringe on human rights in value chains, and to comply with laws relating to forced or compulsory labor and human trafficking, by referring to respect for human rights, refusal to permit discrimination and harassment, and harmony with local communities, including respect for cultures and customs around the world.

In addition, MOLEA has incorporated a "Code of Conduct" into its staff handbook, which sets out the rules employees must follow to reduce the risk of modern slavery in its business.

#### Basic Procurement Policy and Suppliers Procurement Guidelines

The MOL Group established the "MOL Group Basic Procurement Policy" as a corporate group that plays a part in our customers' supply chains. The policy clearly states that the MOL Group promote fair and equitable procurement activities, in consideration of compliance with laws and regulations, conservation of the environment and natural resources, respect for human rights, and doing our utmost to ensure safety.

Based on this Basic Procurement Policy, we have also formulated the MOL Group Suppliers Procurement Guidelines, which cover our requests for all of our business partners.

These guidelines include items relating to human rights, such as prohibition of discrimination, prohibition of inhumane treatment, guarantee of a minimum living wage, elimination of long working hours, elimination of forced labor, eradication of

child labor, freedom of association and collective bargaining rights.

In order for the MOL Group to further enhance the transparency and sustainability of its value chain, all business partners are requested to understand and comply with these guidelines.

For more information on the MOL Group basic procurement policy and suppliers procurement guidelines, please visit our website.

<https://mol.disclosure.site/en/themes/232>

## **5. Actions to Prevent Forced or Compulsory Labor and Human Trafficking**

### Human Rights Due Diligence

The MOL Group has established a Human Rights Due Diligence framework based on the MOL Group Human Rights Policy and initiated activities to identify negative impacts on human rights and their risks in the Group and its value chain.

Under the leadership of a Representative Director/Executive Vice President who concurrently serves as the Chief Environment and Sustainability Officer (CESO), we make an effort to prevent forced or compulsory labor and human trafficking by strengthening this initiative through the PDCA cycle of identifying human rights issues, implementing improvement measures, verifying effectiveness of improvement measures and reporting progress. For more information on the MOL Group human rights due diligence, please visit our website.

<https://mol.disclosure.site/en/themes/233>

### Remedy Program

MOL has two Compliance Advisory Service Desks – internal and external – for group company employees. Outside attorneys are responsible for the external desk, reporting reported issues to the Compliance Committee Office and liaising between persons who reported the issues and the company on follow-up communications. The desks accept anonymous reporting and strictly maintain the confidentiality of the persons who reported an issue. In addition, those who report a breach of compliance, and those who cooperate in related investigations are fully protected from any reprisal. We also accept reports relating to compliance issues from external parties such as domestic and international business partners at our website.

## **6. Training to Prevent Forced or Compulsory Labor and Human Trafficking**

MOL makes special effort to raise awareness for human rights in daily operations throughout the MOL Group by always making time to enlighten executives and staff on issues related to human rights (such as discrimination, harassment, child labor, etc.) in new employee training programs and position-specific training, which are mandatory. It also organizes and presents lectures about prevention of harassment at briefing sessions for secondees and expatriates before their domestic and international assignments.

MOLEA makes it mandatory for new joiners to understand the law relating to forced or compulsory labor and human trafficking.

## **7. Future Plans**

The MOL Group will further strengthen its human rights due diligence efforts throughout the Group and its value chain to identify, prevent and mitigate negative human rights impacts.

In order for more stakeholders to understand the MOL Group human rights policy, we will strive to develop the capabilities of our executives and staff through human rights training and other activities, incorporate this human rights policy into relevant internal policies and business activities, and provide explanations to business partners.

In addition, we will take steps to ensure that appropriate remedial measures are taken if human rights violations are caused directly or indirectly by our business activities.

We will ensure accountability regarding our steps to protect human rights by disclosing information on a regular basis through our website and other means.

Through these efforts, The MOL Group will strive to strengthen monitoring, including the prevention of forced or compulsory labor and human trafficking, steadily fulfil its social responsibility and contribute to the creation of a sustainable society while building trust in relationships with stakeholders.

This statement was approved by the Board of MOL on June 21 2022, and by MOLEA's Board of Directors on June 15 2022.

June 21, 2022

*T. Hashimoto*

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Takeshi Hashimoto  
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Mitsui O.S.K. Lines, Ltd.



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Tatsuuro Watanabe  
Managing Director  
MOL (EUROPE AFRICA) LTD.