

Company Name Mitsubishi Motors Corporation
Industry Automotive (Own Operations and Supply Chain)
Overall Score 5.3 out of 100

Theme Score	Out of	For Theme
1.9	10	A. Governance and Policies
1.4	25	B. Embedding Respect and Human Rights Due Diligence
1.5	20	C. Remedies and Grievance Mechanisms
0.6	25	D. Performance: Company Human Rights Practices
0.0	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: International Bill of Human Rights: The Company states that "Mitsubishi Motors respects basic human rights in our business activities [...] Mitsubishi Motors supports and respects the following international norms and standards: The International Bill of Human Rights and relevant treaties on human rights" [Human Rights Policy, 06/2019: mitsubishi-motors.com] Score 2 • Met: Commitment to the UNGPs: The Company indicates that "Mitsubishi Motors supports and respects [...] the UN Guiding Principles for Business and Human Rights." [Human Rights Policy, 06/2019: mitsubishi-motors.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Company has a commitment to the ILO Core: The Company indicates that "Mitsubishi Motors supports and respects [...] the ILO Declaration on Fundamental Principles and Rights at Work and relevant standards" [Human Rights Policy, 06/2019: mitsubishi-motors.com] • Met: Company has a explicit commitment to All four ILO Core: TThe Company explicitly lists the four ILO Core Labour Standards. It further states "we do not tolerate unfair discrimination or harassment [...] Mitsubishi Motors does not accept child labour, or forced labour [...] Mitsubishi Motors respects the right of an employee to associate. We also engage in sincere dialogue and consultations with our employees or representatives of employees." The Company further asserts that "Where we face conflicts between internationally recognized human rights and national laws, we will seek ways to honor the principles of international human rights." [Human Rights Policy, 06/2019: mitsubishi-motors.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to commit to ILO Core: The Company's Supplier CSR Guidelines cover the expectation that suppliers abolish discrimination in all cases of employment, prohibit child labour and forced labour. However, it is unclear whether the Company requires suppliers to respect the freedom of association and collective bargaining under all circumstances as it states "The freedom of association by employees should be reconized according to the regulations of each country". The company does not require suppliers to offer alternative means of employee association and collective bargaining. [Supplier CSR Guidelines, 06/2019: mitsubishi-motors.com] • Not Met: Company explicitly list All four ILO for suppliers: See above. [Supplier CSR Guidelines, 06/2019: mitsubishi-motors.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect H&S of workers: The Company indicates it "strives to ensure access to 'Decent Work', such as the provision of [...] safe and healthy workplace." However, it is unclear if the company is committed to respect the Health and Safety of its workers. Previously, this assessment was partly based upon the Company's Mitsubishi Motors Sustainability Report 2019 which CHRB no longer considers is a suitable source for policy statements. [Human Rights Policy, 06/2019: mitsubishi-motors.com] & [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Company indicates it "strives to ensure access to 'Decent Work', such as the provision of [...] appropriate working hours." However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Human Rights Policy, 06/2019: mitsubishi-motors.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The Company indicates, on its Supplier CSR Guidelines: 'The highest priority should be given to ensuring the safety and health of the employees in carrying out their job duties to prevent accidents and disasters' and requires commitment from its suppliers. The Supplier CSR Guidelines asks suppliers to 'express your intention toward our CSR initiatives by signing and submitting the 'SUPPLIER COMMITMENT' for the Guidelines and to further promote your implementation of CSR'. [Supplier CSR Guidelines, 06/2019: mitsubishi-motors.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Company indicates that "The regulations of each country pertaining to the number of working hours (including overtime work) [...] must be observed". However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Supplier CSR Guidelines, 06/2019: mitsubishi-motors.com]
A.1.3.a.MO	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (MO)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Responsible mineral sourcing • Not Met: Based on OECD Guidance • Not Met: Requires suppliers to commit to responsible mineral sourcing: The Supplier CSR Guidelines indicates that it expects the 'Non use of raw materials such as conflict minerals that will cause social problems'. Supplier CSR Guidelines asks suppliers to 'express your intention toward our CSR initiatives by signing and submitting the 'SUPPLIER COMMITMENT' for the Guidelines and to further promote your implementation of CSR'. However, it is unclear if the company requires suppliers to commit to responsible source of minerals. [Supplier CSR Guidelines, 06/2019: mitsubishi-motors.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for all minerals • Not Met: Suppliers expected to make similar requirements of their suppliers
A.1.3.b.MO	Commitment to respect human rights particularly relevant to the industry –	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights • Not Met: Children's rights • Not Met: Migrant worker's rights • Not Met: Expects suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles

Indicator Code	Indicator name	Score (out of 2)	Explanation
	vulnerable groups (MO)		<ul style="list-style-type: none"> • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: The Company commits to remedy: The Company indicates that "Where Mitsubishi Motors identifies that it has caused or contributed to a negative impact on human rights, we will provide for or cooperate in legitimate internal and external processes to provide remediation." [Human Rights Policy, 06/2019: mitsubishi-motors.com] • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance attacks on HRs Defenders (HRDs) • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs: The Company indicates its 'CSR Management Committee'. However, no further details found, including Human Rights approach. [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com] • Not Met: Describe HR expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO: The Company published in its website a letter from its CEO where it provides an overview of CSR within the Company. Although human rights topics are included (signatory to the UNGC, new HR policy, and importance of diversity), this indicator looks for evidence of a speech/letter that focuses on human rights or discussed its business importance. [Commitment of top management, N/A: mitsubishi-motors.com]
A.2.2	Board responsibility	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board/Committee review HRs strategy • Not Met: Examples/trends re HR discussion in the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Incentives for at least one board member • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board process to review bussiness model and strategy • Not Met: Describe frequency and triggers for reviewing <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Senior responsibility for HR implementation and decision making: The Company indicates its 'CSR Management Committee', chaired by the CEO. However, no details found in relation to human rights. [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How it assigns Day-to-day responsibility • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: HR risks is integrated as part of enterprise risk system: The Company reports: 'Mitsubishi Motors has put in place and works to improve its risk management system for the entire Group through three types of risk management activities: priority risk management, departmental risk management and affiliated company risk management'. Also, it states: 'these risk management activities are regularly reported to the Board of Directors as key internal control measures'. However, no evidence of human rights integration in the development of risk management system. [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Provides an example • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a • Met: Communicates its policy to all workers in own operations: The Company indicates in a chart that all its employees received Human Rights training. [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience: Although the Company discloses a chart with its stakeholders and examples of engagement, it does not refer to communication of policy commitments. [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com]
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com] & [Supplier CSR Guidelines, 06/2019: mitsubishi-motors.com] • Met: Requires suppliers to communicate policy requirements: The Company discloses: 'Aiming for collaborative initiatives with suppliers, Mitsubishi Motors formulated its Supplier CSR Guidelines in 2010. Through these guidelines, we promote collaborative activities with our suppliers from the same point of view'. Additionally, it indicates that 'providing suppliers with appropriate information and two-way communication is essential for proper supply chain management. At the end of every fiscal year, Mitsubishi Motors holds Suppliers Meeting to make our policy for next fiscal year well-known. In addition: 'MMC requests suppliers to comply with Supplier CSR Guidelines and to disseminate them throughout their supply chain and consignment suppliers'. [Supplier CSR Guidelines, 06/2019: mitsubishi-motors.com] & [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How HR commitments made binding/contractual • Not Met: Company requires suppliers to cascade down to their suppliers
B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: How workers are trained on HR policy commitments: The Company indicates in a chart that all its employees received Human Rights training. [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com] • Met: Trains relevant managers including procurement: The company states: 'As part of managing the Supplier CSR Guidelines, we take efforts to ensure that the guidelines are well-known within the company. As part of Mitsubishi Motors procurement training, we conduct training for new employees (both entry-level and new midcareer employees), as well as training when employees are transferred. In fiscal 2018, briefings were held when the guidelines were re-established in February 2019. [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company indicates: 'In order to mutually confirm and promote CSR activities, MMC begins the supplier confirmation of agreement with the guidelines. MMC may ask supplier to take a CSR compliance assessment conducted by a third party, a certified organization, for the purpose of understanding the status of supplier's CSR approaches and encouraging suppliers to enhance them'. Its Supplier's CSR Guidelines contains human rights issues. 'In fiscal 2018, we conducted process audits at 89 suppliers and 115 plants'. [Supplier CSR Guidelines, 06/2019: mitsubishi-motors.com] & [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com] • Not Met: Proportion of supply chain monitored • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Describes corrective action process: The Company indicates that 'improvements to issues pointed out during these audits were generally implemented in three months or less'. No further details found including corrective action process and number of incidences. [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com] • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: HR affects selection of suppliers • Not Met: HR affects on-going supplier relationships <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Not Met: Working with suppliers to meet HR requirements
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifying risks in own operations: The Company states: 'Mitsubishi Motors will identify, prevent, or mitigate negative impacts on human rights which may be caused by our business activities through the application and support of human rights due diligence processes'. However, no further details found in relation to the process to identify its human rights risks and impacts. [Human Rights Policy, 06/2019: mitsubishi-motors.com] • Not Met: Identifying risks through relevant business relationships <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues • Not Met: How process applies to supply chain • Not Met: Public disclosure of the results of HR assessment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Action Plans to mitigate risks • Not Met: Description of how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HR issues <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: System for tracking or monitor if actions taken are effective • Not Met: Lessons learnt from checking system effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company reports: 'The Mitsubishi Motors Global Hotline established in fiscal 2018 was set up within an outside firm providing such services. This makes it possible to file anonymous reports. Systems for identifying and managing risks of the entire group have been put in place, too, with Mitsubishi Motors headquarters even able to check details of reports from subsidiaries and associates'. Also, it discloses: 'Mitsubishi Motors has established an internal consultation office (Employee Consultation Office) allowing employees of the Company or its subsidiaries and associates in Japan to report or consult about such conduct. Outside the Company, we have set up a consultation office staffed by outside attorneys'. [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Channel is available in all appropriate languages and workers aware: Although the Company indicates its Global Hotline, there is no mention to availability in all appropriate languages. [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describe how workers in the supply chain have access to grievance mechanism • Not Met: Expect Suppliers to convey expectation to their own suppliers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism for community <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness • Not Met: Communities access mechanism direct or through suppliers • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Response timescales and how complainants will be informed • Not Met: Describe support (technical, financial, etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising complaints or concerns	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Public statement prohibiting retaliation: The Company reports in its Global Code of Conduct: 'We shall carry out our work in accordance with this Global Code of Conduct. When we have come to know any violation of this Global Code of Conduct, we shall immediately report it to the Company, and the executives and employees who have come forward with such information based on their own beliefs shall be infallibly protected from any form of retaliation'. However, it is not clear whether the statement includes other stakeholders. [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com] • Met: Practical measures to prevent retaliation: The Company discloses the possibility to file anonymous reports. [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how remedy has been provided • Not Met: Says how it would provide remedy for victims if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved: Although the Company indicates in a chart the Number of Reports and

Indicator Code	Indicator name	Score (out of 2)	Explanation
	grievance mechanism(s) and incorporating lessons learned		<p>Consultations Fielded by Consultation Offices by Category, it does not disclose human rights concerns or complaints. [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com]</p> <ul style="list-style-type: none"> • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

D.5 Automotive Manufacturing

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.1.a	Living wage (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Pays living wage or sets target date: The Company indicates that 'strives to ensure' a living wage to its employees. However, it does not disclose its target timeframe, nor evidence that it has achieved paying living wage to all employees. [Human Rights Policy, 06/2019: mitsubishi-motors.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how living wage determined • Not Met: Paying living wage • Not Met: Definition of living wage reviewed with unions
D.5.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses living wage requirements in supplier code or contracts • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.5.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Avoids business model pressure on HRs (purchasing practices) • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.5.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields) <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.5.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Does not use child labour: The Company states: 'Mitsubishi Motors does not accept any unjustifiable labor practices such as slavery labor, child labor, or forced labor, including human trafficking, and we strive to eliminate such labor practices'. [Human Rights, N/A: mitsubishi-motors.com] • Not Met: Age verification of workers recruited <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remediation if children identified
D.5.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Child Labour rules in codes or contracts: The Company indicates the prohibition of child labour: 'Employment of a child under the age eligible for work as described by the regulations in each country must not be permitted'. No evidence found, however, in relation to age verification requirements nor remediation programmes in place in case child labour is found. [Supplier CSR Guidelines, 06/2019: mitsubishi-motors.com] • Not Met: How working with suppliers on child labour <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Job seekers and workers do not pay recruitment fee • Not Met: Commits to fully reimbursing if they have paid Score 2 <ul style="list-style-type: none"> • Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters
D.5.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Debt and fees rules in codes or contracts • Not Met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.5.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays workers in full and on time • Not Met: Payslips show any legitimate deductions Score 2 <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.5.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts • Not Met: How working with supply chain to pay workers regularly and on time Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.5.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Does not retain documents or restrict movement Score 2 <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.5.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Free movement rules in codes or contracts: The Company states: 'It shall be guaranteed that all work is voluntary, employees are free to leave their job, and no employee will be forced to work'. However, no evidence found specifically related to free movement and retention of passports or other identification document. [Supplier CSR Guidelines, 06/2019: mitsubishi-motors.com] • Not Met: How working with suppliers on free movement Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.5.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: Although the Company indicates its efforts to support labour unions, in addition to collective bargaining, the measures in order to prohibit harassment, violence and intimidation are not clear. [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com] • Not Met: Discloses % total direct operations covered by collective CB agreements: The Company indicates: 'As of April 2019, our labor union had 12,655 members (excluding reemployed senior staff), accounting for 99% of general employees excluding officers and management'. Not clear, however, the total percentage of workforce covered by collective bargaining agreements. [Mitsubishi Motors Sustainability Report 2019, 2019: mitsubishi-motors.com] Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: FoA & CB rules in codes or contracts: The Company states: 'The freedom of association by employees should be recognized according to the regulations of each country'. However, no further details found including non-retaliation to union members or representatives, collective bargaining, and alternative mechanisms in those places where the exercise of these rights is restricted under local law. [Supplier CSR Guidelines, 06/2019: mitsubishi-motors.com] • Not Met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.5.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes process to identify H&S risks and impacts • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The Company discloses the accident frequency of 0.30 in 2020. [Mitsubishi Motors Sustainability Report 2021, 10/2021: mitsubishi-motors.com] • Met: Discloses Fatalities for last reporting period: The Company discloses there were no fatal accidents in fiscal 2020. [Mitsubishi Motors Sustainability Report 2021, 10/2021: mitsubishi-motors.com] • Not Met: Occupational disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance: The Company discloses the 'Creation of safe workplaces' as target for Health and Safety in 2021. Also, it discloses the target of 'Ongoing measures for the creation of safe workplaces' in 2021. However, no specific quantitative targets found, or a target of zero harm. [Mitsubishi Motors Sustainability Report 2021, 10/2021: mitsubishi-motors.com] • Not Met: Met targets or explain why not or what is doing to improve management systems: The Company indicates the target of 'Creation of safe workplaces' and discloses that the number of accidents with or without loss of workdays in 2020. It discloses that the target for accidents was not met. However, the company does not provide an explanation for why the target was not met. [Mitsubishi Motors Sustainability Report 2021, 10/2021: mitsubishi-motors.com]
D.5.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Sets out clear Health and Safety requirements • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period • Not Met: Fatalities disclosures for last reporting period • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made
D.5.8.a	Women's rights (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Process to stop harassment and violence against women: Although the Company states: 'We do not tolerate unfair discrimination or harassment on bases such as race, color of skin, nationality, ethnicity, family origin, sex, sexual orientation, gender identity, age, disability, language, or religion', no further evidence found, including processes to prohibit harassment, intimidation and violence against women. [Human Rights Policy, 06/2019: mitsubishi-motors.com] • Not Met: Working conditions take account of gender • Not Met: Measures and steps to address gender pay gap at all levels of employment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meet all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap
D.5.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts: The Company states: 'In all cases of employment, there must be no discrimination against any race, ethnic group, country of origin, nationality, religion, gender, and so forth'. However, no further details related to women's rights. [Supplier CSR Guidelines, 06/2019: mitsubishi-motors.com] • Not Met: How working with suppliers on women's rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made
D.5.9.a	Working hours (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Respects max hours, min breaks and rest periods in its own operations: The Company states that strives to ensure access to appropriate working hours. However, no mention to ILO conventions on labour standards on working hours, or to maximum working hours for a regular working week and minimum breaks. [Human Rights Policy, 06/2019: mitsubishi-motors.com] • Not Met: Assesses ability to comply with its commitments when allocating work/targets <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How it implements and checks this in its operations
D.5.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Working hours in codes or contracts: The Company states: 'The regulations of each country pertaining to the number of working hours (including overtime work), and the granting of holidays and annual leave with pay, etc., must be observed'. However, no evidence against respect to ILO conventions on working hours, or specific requirements regarding maximum working hours for regular working week and minimum breaks. [Supplier CSR Guidelines, 06/2019: mitsubishi-motors.com] • Not Met: How working with suppliers on working hours <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made
D.5.10.a	Responsible Mineral Sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Due diligence in accordance with OECD Guidance in supplier contracts • Not Met: Works with smelters/refiners and suppliers to build capacity <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Contractual requirement to disclosure smelter/refiner information • Not Met: Contractual requirement covers all minerals
D.5.10.b	Responsible Mineral Sourcing: Risk identification in mineral supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Risk identification and disclosure in line with OECD Guidance • Not Met: Identification of smelter/refiners and OECD Guidance <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses smelters/refiners judged in line with OECD Guidance • Not Met: Risk identification and disclosure covers all minerals
D.5.10.c	Responsible Mineral Sourcing: Risk management in the mineral supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes mineral risk management plan for supply chain • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time • Not Met: Disclose better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy • Not Met: Risk management and response processes cover all minerals
D.5.11	Responsible Materials Sourcing	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Due diligence for raw materials in supplier code/contracts: The Company states: 'To avoid the use of raw materials involving an inhumane act, it is essential to comprehend the situation as well as take appropriate measures'. However no further evidences against requirements to conduct due diligence for raw materials. [Supplier CSR Guidelines, 06/2019: mitsubishi-motors.com] • Not Met: Works with suppliers to build capacity in risk assessment and due diligence <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not Met: Identify the sources of high-risk raw materials in its supply chain

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Working Hours • Headline: Japanese authority recognizes Mitsubishi Motor employee's suicide as occupational fatality caused by work-related mental disorder developed due to overtime work exceeding 139 hours per month in 2019 • Story: A Mitsubishi Motor employee took his own life in February 2019 after having worked excessive overtime hours in the months before his death. <p>His death was investigated by the labor standards inspection office, which found that in the month before his death the man put in 139 hours of overtime. This led the office to conclude that the long hours led to the psychological problems that resulted in his suicide.</p> <p>According to his family, the man worked at the company dormitory on weeknights where he was staying and on weekends when he returned to the family home, he would often go to a nearby library to work.</p> <p>The smartwatch he used recorded how little sleep the man had in the month before he developed psychological problems. On 16 days, he got less than five hours of sleep a night and there were also days when he only slept for about two and a half hours.</p> <p>The company had also designated the man as being in a supervisory position, which meant regulations covering working hours did not apply to him. [Business and Human Rights Resource Centre, 18/06/2020, "Japan: Labour authorities recognize Mitsubishi Motors employee's suicide as work-related death": business-humanrights.org] [The Asahi Shimbun, 28/06/2020, "Mitsubishi Motors worker's suicide certified as death from overwork": asahi.com]</p>
E(1).1	The company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Public response: Mitsubishi Motors on June 17 issued a statement saying it deeply regretted the fact that one of its employees had died. However, the company does not address the reasons that led to the employees suicide. [The Asahi Shimbun, 28/06/2020: asahi.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: See above.
E(1).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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