

UACJ Group Modern Slavery Statement (2023)

“Contribute to a prosperous and sustainable society with technologies that bring out the innate power of Materials.”: this is our purpose stated in the “UACJ Group Philosophy”. Under this purpose, the UACJ Group is committed to contributing to society at large by operating its business sustainably, and is working to prevent modern slavery and human trafficking throughout its organisation and supply chain.

1. UACJ Group’s business and supply chain

UACJ Corporation is a global comprehensive aluminum manufacturer, headquartered in Tokyo, Japan. UACJ Group has been expanding its global business since its incorporation in 2013, by a merger of Furukawa-Sky Aluminum Corp. and Sumitomo Light Metal Industries, Ltd. UACJ Group now consists of 53 group companies, operating in 12 countries and has approximately 10,000 employees worldwide (as of 31 March 2024).

UACJ Group has a global annual turnover of £4,709 million (¥894.74 billion (£1= ¥190), fiscal year 2023/2024).

Its business has 6 main units: Flat Rolled Products; Automotive Parts; Extruded Products; Foil Products; Cast & Forged Products; and Precision-machined Products. For further details of each unit’s business, please see <https://www.uacj.co.jp/english/company/profile/business.htm>.

We source raw aluminum materials from territories such as Australia and the Middle East.

UACJ Corporation made this statement on behalf of the entire UACJ Group companies, and this statement represents UACJ Group’s compliance to the Modern Slavery Act 2015 and commitment to prevent modern slavery and human trafficking throughout its organisation and supply chain.

2. Our policies on modern slavery and human trafficking

We understand the importance of respecting human rights. As a reflection of our commitment to respecting human rights and to ensuring that none of any modern slavery or human trafficking occurs anywhere in our business or supply chain, we set, and constantly review and update, the following policies in place:

1) UACJ Group Philosophy

UACJ Group Philosophy consists of Our Purpose, Vision and Values.

<https://www.uacj.co.jp/english/company/management/policy.htm>

2) UACJ Way

UACJ Group employees ('employees' includes 'executives') are required to hold "Safety and Compliance" as their top priority, and follow the three values: "Mutual understanding and respect"; "Honesty and future orientation"; and "Curiosity and a sense of challenge." UACJ Way is a guideline for all employees to act in line with the aforementioned UACJ Group's values.

<https://www.uacj.co.jp/english/company/management/uacjway.htm>

3) UACJ Group Code of Conduct

The UACJ Group Code of Conduct, which incorporates the intent of the International Bill of Human Rights and set forth rules for all employees, including, but not limited to respect for human rights, has been translated into English, Chinese, Czech, Indonesian, Thai, Spanish, Vietnamese, Brazilian Portuguese and Malay, as well as Japanese, and is presented to employees. In FY2023, UACJ prepared the "Code of Conduct Guidebook," which explains the contents of the UACJ Group Code of Conduct in an easy-to-understand manner and disseminated it to employees.

4) UACJ Group Human Rights Policy

In March 2022, we formulated UACJ Group Human Rights Policy, which sets out our commitment to respect and uphold human rights and never allow child labour or forced labour, and have informed all member companies in UACJ Group. We plan to amend the Policy in FY 2024 and add a section on human resources development to the Policy.

5) UACJ Group Sustainable Procurement Guidelines

In December 2023, we fully revised the “UACJ Corporation CSR Deployment Guideline for Suppliers” which was replaced by the “UACJ Group Sustainable Procurement Guidelines”. The revision clarifies that we promote sustainable activities based on UACJ Group Philosophy, and also stipulates that we strive to establish a mechanism for consultations, negotiations, and remedies that are available for the workers, business partners, and other stakeholders to detect early and correct problems in UACJ Group and its supply chain.

All of our suppliers, contractors and other business partners of UACJ Group are requested to comply with the UACJ Group Sustainable Procurement Guidelines.

https://www.uacj.co.jp/english/sustainability/social/pdf/UACJ_Sustainable_Guidelines.pdf

6) The Concept of hiring employees

We have a similar concern which NGOs have pointed out that the working environment in Japan for foreign technical interns, in general terms, is at risk of being modern slavery. In January 2023, we deliberated on the “Approach to be taken when employing technical interns” which stipulates, among other things, that human rights due diligence should be conducted at workplaces where utilize the technical intern training system, and corrective measures should be implemented and external disclosure should be promoted. Taking advantage of this deliberation, we are now moving forward with efforts to implement human rights due diligence for all employees, both in Japan and overseas, in order to responsibly employ not only foreign technical intern trainees but also all employees.

7) United Nations Global Compact

In April 2021, we became a signatory to the United Nations Global Compact and have expressed our support for its 10 principles on human rights, labour, and other issues, and we report annually on UACJ Group's efforts.

8) Whistleblowing Policy and Procedure

In addition to the above policies, the UACJ Group has established a

whistleblowing hotline that all employees across group companies (excluding a few group companies such as Tri-Arrows Aluminum Holding Inc., Tri-Arrows Aluminum Inc. and UACJ Automotive Whitehall Industries, Inc.) can access completely anonymously in their local language. The whistleblowing hotline addresses human rights and compliance issues, including, but not limited to harassment, without delay. In Japan, in October 2021, we strengthened our anti-harassment measures by establishing “Workplace Harassment Hotline”.

3. Due diligence assessment

We focus on the risks of modern slavery in the areas of 1) raw materials supply chain, 2) working hours, and 3) foreign technical interns.

1) Supply chain compliance

To ensure all suppliers in our supply chain comply with our policies and values, we have indicated “Request for Cooperation in Compliance with CSR Procurement Guidelines” on forms we issue to our suppliers in Japan since April 2020. This approach has been followed since the revision of the “CSR Deployment Guideline” to “Sustainable Procurement Guidelines” in December 2023.

2) Working hours

UACJ Corporation annually conducts a survey and provides internal training regarding its employees’ working hours in order to prevent forced labour. There was no serious breach of laws and regulations of working hours in 2023.

3) Foreign technical interns

We conducted human rights due diligence on foreign technical interns in accordance with the “Approach to be taken when employing technical interns” at some of our workplaces where the foreign technical internship system were utilized. As results of the due diligence, we found no problem requiring immediate correction with regard to working environment for our foreign technical interns.

4. Training

To secure understanding of the risks of modern slavery and human trafficking in our supply chain and our business, UACJ Group (excluding a few group companies such as Tri-Arrows Aluminum Holding Inc., Tri-Arrows Aluminum Inc. and UACJ Automotive Whitehall Industries, Inc.) has been providing training to all employees since 2014. The training programme includes compliance to laws and regulations, respect to human rights and equality, and prohibition of child labour and forced labour, as well as power harassment prevention. We also require all the president of each UACJ Group company to submit a signed pledge which shows their compliance with the UACJ Group Code of Conduct.

5. Looking ahead

1) Supply chain compliance

UACJ Group continues to review our own business operations and procurement procedures to ensure that risks of modern slavery are properly addressed. In FY2024, we will also promote awareness-raising activities to ensure that our suppliers agree with the aims of the “Sustainable Procurement Guidelines”.

2) Human rights due diligence

With the aim of conducting human rights due diligence on all our employees globally, UACJ Group plans to conduct human rights due diligence at several of its workplaces in FY2024.

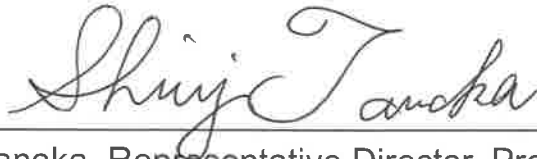
3) Internal training

We will also increase our efforts to provide human rights training to all our employees on every level and further expand such training to our supply chain.

4) Establishment of regulations

In FY2024, UACJ Group plans to establish regulations setting out the process for human rights due diligence.

This document is made pursuant to section 54(1) of the Modern Slavery Act 2015, to provide a slavery and human trafficking statement covering UACJ Group's activities for the financial year ending 31 March 2024. This statement was approved by the Board of Directors at its meeting on 29 August 2024.

A handwritten signature in cursive script, reading "Shinji Tanaka".

Shinji Tanaka, Representative Director, President
UACJ Corporation

Date: 19 September 2024