

Statement on the UK Modern Slavery Act (FY 2020)

1 . Overview of the UACJ Group Businesses

Globally, the UACJ Group, centered on UACJ, the aluminum material manufacturer, deploys a wide variety of products made from aluminum. The group is consisted of 70 companies with about 10,000 employees in total (as of March 31, 2021).

Regarding the UACJ Group businesses, please see the following:

<https://www.UACJ.co.jp/company/profile/index.htm>

The corporate philosophy and action guidelines of the UACJ Group are available at the following:

<https://www.UACJ.co.jp/company/management/policy.htm> (Corporate philosophy)

<https://www.UACJ.co.jp/company/management/UACJway.htm> (Action guidelines: the UACJ Way)

2 . Policy on the Prevention of Forced Labor and Human Trafficking

In order to realize our corporate philosophy, the UACJ Group established the UACJ Group Code of Conduct, which governs all matters of compliance involving the Group's executive officers and employees. The Group published the Code in the language of each country where the UACJ Group deploys businesses.

The UACJ Group Code of Conduct stipulates compliance with international norms governing human rights, such as the International Bill of Human Rights, and the specific laws and regulations of each country and region as the Group strives to respect human rights in all business activities and will never condone forced labor, human trafficking, or child labor.

3 . Initiatives for the Prevention of Forced Labor and Human Trafficking

(1) Implementation of education on the Code of Conduct for the entire Group

Since 2014, the year following management integration, the UACJ Group has provided annual education for its executive officers and employees on the Code of Conduct during the period from October to December. The program provides education on compliance, respect for human rights, prohibition of discrimination, respect for diversity, and prohibition of child labor and forced labor. The president of each Group company has submitted a letter pledging compliance with the Code of Conduct to the president of UACJ

in order to ensure the initiatives of complying with the Code of Conduct and to ensure employees thoroughly comply as well.

(2) Request for suppliers to comply with the CSR Procurement Guidelines

The UACJ Group provides the CSR Procurement Guidelines to suppliers and asks that they implement the initiatives for compliance and respect for human rights. Furthermore, UACJ has stipulated the request to cooperate in complying with the CSR Procurement Guidelines in individual contracts (order forms) since April 2020 and asks suppliers to comply with the Guidelines with each contract. As of the end of fiscal year 2020, we have asked for cooperation from all of client companies supplying raw materials and approx. 85% of the material-related client companies in business transactions in Japan.

(3) Promptly identifying human rights risks: Expansion and improvement of the whistle-blowing system

The UACJ Group has established a whistle-blowing desk at each of the Group companies in an attempt to promptly identify and correct human rights problems, such as harassment, and compliance problems. In 2019, a common whistle-blowing desk for executive officers and employees of each of the Group companies was established at the head office of UACJ. For the Common Desk, the convenience of whistle-blowers has been improved, and their protection has been enhanced for each of the Group companies, such as whistle-blowing by e-mail and in writing and the introduction of a cloud-type whistle-blowing system to ensure complete anonymity when reporting violations. For the Group companies outside Japan, a website as a whistle-blowing desk has been established, and a system for whistle-blowers and the whistle-blowing secretariat to communicate violations in their respective languages and to appropriately respond to compliance problems has been improved. Within the Group, there have been no whistle-blowing consultations on forced labor, human trafficking, or child labor alleging violations of the UK Modern Slavery Act in fiscal year 2020.

(4) Eradication of inappropriate labor, such as forced labor: Surveys on working hours and conditions

At UACJ and each of the Group companies in Japan, annual surveys and annual education programs on labor management have been implemented since fiscal year 2018. In the annual survey, management interviews employees as needed and confirms the operational status of labor management. In fiscal year 2020, there have been no serious violations of working hours. Because an NGO pointed out that the technical intern training program in Japan might form an opportunity for slave labor, a survey on the working conditions of technical interns at UACJ was implemented and appropriate responses, such

as the conclusion of the Notice of Employment (written in Japanese and a local language), payment of fair remuneration, and compliance with the laws and regulations on overtime hours, have been confirmed.

4. Future Initiatives

(1) Expansion of the request for suppliers to cooperate with the CSR Procurement Guidelines

In order to prevent forced labor and human trafficking within the Group's supply chain, the Group will also continue requesting all suppliers to cooperate with the CSR Procurement Guidelines.

(2) Expansion and improvement of education on human rights

The Group will continually provide education on the Code of Conduct and expand and improve education on human rights in the training programs for each layer.

This statement has been approved by the CSR Committee of UACJ Corporation on October 6, 2021.

October 28, 2021



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