

UACJ Group Modern Slavery Statement (2021)

"Aluminum is our passion. It inspires our work in building a better world and a healthier environment.": this is UACJ Group's Purpose. Under this philosophy, UACJ Group is committed to contribute widely to society by doing our business sustainably and we work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

1. UACJ Group's business and supply chains

We are a global comprehensive aluminium 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 51 group companies, operating in 15 countries and has approximately 11,000 employees worldwide (as of 31 March 2022).

UACJ Group has a global annual turnover of £3,833 million (¥ 782.90 billion (£1= ¥ 162), fiscal year 2021/2022).

Our 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 aluminium materials from territories including Australia, Middle East.

This statement is made on behalf of the entire UACJ Group companies, representing UACJ Group's compliance to the Modern Slavery Act 2015 and commitment to prevent modern slavery and human trafficking in our 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 modern slavery and human trafficking not taking place anywhere in our business or supply chains, we have, and constantly review and update, the following policies in place which are relevant to modern slavery:

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

UACJ Group's Code of Conduct provides rules for all employees, which includes respect to human rights, incorporating the purpose of the International Bill of Human Rights. It is available in Japanese, English, Chinese, Czech, Indonesian, Thai, Spanish, Vietnamese, Brazilian Portuguese and Malay.

4) UACJ Group Human Rights Policy

In March 2022, we created UACJ Group Human Rights Policy, which sets out our commitment to respect and uphold human rights and never allow child labour, forced labour or human trafficking.

https://www.uacj.co.jp/english/csr/social/pdf/UACJ_CSR_HumanRightsPolicy_en.pdf

5) UACJ Corporation Group CSR Deployment Guideline for Suppliers

All suppliers to UACJ Group are requested to comply with the UACJ Corporation CSR Deployment Guideline for Suppliers.

https://www.uacj.co.jp/english/csr/social/pdf/UACJ_CSR_Guidelines.pdf

6) Whistleblowing Policy and Procedure

In addition to the above policies, UACJ Group implemented a confidential whistleblowing hotline to which all employees across group companies (excl. Tri-Arrows Aluminum Holding Inc., Tri-Arrows Aluminum Inc. and UACJ Automotive Whitehall Industries, Inc.) have access in their local language. The whistleblowing hotline safeguards that any issue involving human rights, including harassment, or compliance is reported and dealt with without delay. The whistleblowing hotline has been further reinforced by "Harassment Hotline", a new measure focussing on harassment issues, which became available for employees in Japan in October 2021.

3. Due diligence assessment

We understand that the following areas give rise to the highest modern slavery risks: 1) supply chain of raw materials, 2) working hours and 3) foreign technical interns.

1) Supply chain compliance

To ensure all suppliers in our supply chain and contractors comply with our policies and values, UACJ Corporation standard forms used for all purchase orders to/from Japan based suppliers include CSR Procurement Guidelines since April 2020.

2) Working hours

UACJ Corporation annually conducts a survey and provide internal training regarding its employees' (including factory workers) working hours in order to prevent forced labour. There was no serious breach of laws and regulations of working hours in 2021.

3) Foreign technical interns

We are deeply concerned about the reports made by NGOs regarding the general working environment of the foreign technical interns in Japan, pointing out a risk of modern slavery in general. We therefore assessed environment of the technical interns working with UACJ Group companies and confirmed that we pay proper compensation and comply with the laws and regulations of working hours. We hereby confirm that UACJ Group companies which employ foreign technical interns enter into an employment agreement with them both in Japanese and applicable local language.

4. Training

To secure understanding of the risks of modern slavery and human trafficking in our supply chains and our business, UACJ Group has been providing training to all employees (except for executives of Tri-Arrows Aluminum Holding Inc., Tri-Arrows Aluminum Inc. and UACJ Automotive Whitehall Industries, Inc. who take separate trainings on this subject) 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. We require all the president of each UACJ Group company to submit a signed undertakings which shows their commitment to adhere to UACJ 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. Our key focus over the next year is to introduce "Sustainable Procurement Guidelines", which is an updated version of the current CSR Procurement Guidelines, from UACJ Corporation and secure the supply chain's compliance to such guidelines. We believe such procurement guidelines will enable us to identify and address modern slavery risks within the supply chain.

2) 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.

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 2022. This statement was approved by the Board of Directors at its meeting on 28 October 2022.

Miyuki Ishihara

Miyuki Ishihara,

Representative Director, President

UACJ Corporation

Date: 28 October 2022