

Office of the High Commissioner for Human Rights
Special Procedures Branch
Palais des Nations
CH-1211 Geneva 10
Switzerland

Ref: AL OTH 41/2026

17 July 2026

Dear Special Rapporteurs,

We write in response to your communication dated 9 April 2026 (ref: AL OTH 41/2026), received on 19 May 2026, and further to our letter of 9 June 2026 communicating our intention to respond by 18 July 2026.

Mitsubishi Corporation ("Mitsubishi" or the "Company") acknowledges the work of the Special Rapporteurs in raising these potential human rights concerns and takes each of the issues identified with the utmost seriousness. This response addresses each of your five questions in turn, and Mitsubishi welcomes the opportunity for continued engagement.

Question 1: Please provide any additional information and/or comment(s) you may have on the above-mentioned allegations.

Mitsubishi holds a 10% equity interest in Compañía Minera Antamina S.A. ("CMA"), the independent operator of the Antamina mine in Peru. The remaining shares are held by BHP (33.75%), Glencore (33.75%), and Teck (22.50%).

Since operational matters are managed by CMA, Mitsubishi has engaged with CMA and the co-shareholders on the issues raised in your letter and has underlined the importance of transparency and good faith engagement with all stakeholders. It is understood that CMA will be providing detailed and comprehensive information in response to your communication separately, and we respectfully direct you to that response for further detail on the factual issues raised.

Question 2: Please provide information on the human rights due diligence policies and processes established by your company to identify, prevent, mitigate, and account for how they address the human rights impacts of its investment activities, in accordance with the UN Guiding Principles on Business and Human Rights. Please clarify how your company requires investees to conduct human rights due diligence to respect human rights, including those of human rights defenders.

Mitsubishi's Policy Framework

Mitsubishi has implemented its human rights due diligence framework in line with the United Nations Guiding Principles on Business and Human Rights ("UNGPs"), and above all the core responsibility to respect human rights. Mitsubishi's commitment is to respect all internationally recognized human rights (among them the rights set out in the International Bill of Human Rights and the fundamental rights principles in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work).

Mitsubishi's commitment to respect human rights, together with human rights due diligence processes, is set out principally in our Human Rights Policy ("HRP"), which is supplemented by the Corporate Standards of Conduct, Code of Conduct, Social Charter and Policy for Sustainable Supply Chain Management.

The HRP applies to all officers and employees of Mitsubishi. We also communicate this framework to our group companies and encourage them to implement human rights initiatives and conduct their business operations in a manner consistent with the principles set out in this framework. Each of the core aspects of Mitsubishi's human rights due diligence process is elaborated in the paragraphs that follow.

First, for the purpose of identifying and assessing actual or potential adverse human rights impacts that Mitsubishi has caused or contributed to through our own activities, or to which Mitsubishi is directly linked through the operations, products or services provided by our business relationships, Mitsubishi assesses both the potential and the actual human rights risks associated with our business sectors and geographical areas, including impacts relating to the environment, health and local communities.

Second, Mitsubishi incorporates the identified risks into our investment decision-making and business management processes and implements mitigation measures as necessary.

Third, to ensure transparency and accountability, Mitsubishi seeks to provide details of our policies and initiatives through sustainability reporting and other disclosures. Mitsubishi discloses its human rights approach and performance by means of public disclosures. For example, the Integrated Report provides an overview of Mitsubishi's human rights initiatives.

In addition, the objectives of the UN Declaration on the Rights of Indigenous Peoples ("UNDRIP") and the Indigenous and Tribal Peoples Convention (ILO Convention No. 169) have a foundational influence on Mitsubishi's approach to human rights, and are reflected in our Policy on Indigenous Peoples' Rights.

Approach to investee companies

Mitsubishi expects investee companies to establish their own policies and procedures, informed by the policies of shareholders and recognized international standards.

Nevertheless, Mitsubishi acknowledges that our responsibility to respect human rights extends to the entities in our value chain and business partners, and that, as a shareholder in a joint venture and consistent with the UNGPs, we can be directly linked to potential adverse human rights impacts arising through our business relationships with an operating entity. Mitsubishi seeks to ensure that its business partners and others in its value chain respect human rights by, for example, communicating its expectations on human rights to those partners and, where appropriate, monitoring and assessing potential human rights risks through applicable governance channels. We expect all entities in which we invest and with which we do business to comply with applicable laws and internationally recognized human rights standards.

Finally, for suppliers, Mitsubishi's Policy for Sustainable Supply Chain Management sets out detailed minimum expectations covering forced labour, child labour, safe and healthy working conditions, freedom of association and collective bargaining, non-discrimination, prohibition of abuse and harassment, working hours, suitable remuneration, anti-corruption, protection of the environment and local communities, and information disclosure. Mitsubishi shares this policy in its contracts with suppliers, monitors compliance through an annual Sustainable Supply Chain Survey and site visits, requests corrective measures where a violation is identified, and will re-evaluate a business relationship where a supplier fails to implement the necessary corrective action despite continued guidance and support. Mitsubishi reinforces these expectations through capacity building, including an annual Business and Human Rights Seminar (attended by suppliers and operating companies).

Question 3: Please provide information on the measures that your company has taken or is planning to take to address the concerns mentioned and to provide remedial

measures to address the negative human rights impacts caused by its investment activities.

Mitsubishi recognizes the gravity of the concerns raised in your letter and we are treating this matter with the utmost seriousness.

In respect of investee companies, Mitsubishi expects the operating company to properly investigate and, where necessary, remedy any identified adverse human rights impact through its own grievance mechanisms. Mitsubishi expects all of its investee companies to comply with applicable laws and internationally recognized human rights standards and to implement improvement measures wherever needed.

In relation to our role as a shareholder in CMA specifically, Mitsubishi has engaged both with the other shareholders of CMA and with CMA directly through the existing governance channels, in order to investigate the matters raised in your letter so that any potential impacts are identified and mitigated as far as possible.

In addition, Mitsubishi ensures that appropriate remedial measures and grievance mechanisms are available (as outlined further in response to Question 5 below), where Mitsubishi may cause or contribute to potential adverse human rights impacts.

Question 4: Please provide information on policies your company has taken or is considering taking to ensure the protection of human rights defenders and groups that may be in a situation of vulnerability.

Mitsubishi's Human Rights Policy affirms our commitment to respecting the human rights of all stakeholders involved in our business activities, and explicitly recognizes the importance of giving due consideration to individuals who may be in vulnerable positions.

Vulnerable Groups and Indigenous Peoples

Mitsubishi maintains a number of policies directed at groups that may be in situations of vulnerability. Our Policy on Indigenous Peoples' Rights pays special attention to upholding the rights of indigenous peoples, recognizing their unique social and legal status. When evaluating new business investment proposals, Mitsubishi assesses their potential impacts on these rights and consults with relevant stakeholders, guided by our policies to support the UN Declaration on the Rights of Indigenous Peoples and ILO Convention No. 169. Furthermore, our Policy on Children's Rights reflects commitment to the relevant UN and ILO instruments, and our Policy on the Appointment of Armed Security requires compliance with local law and adherence to recognized international standards, including the Voluntary Principles on Security and Human Rights, the UN Code of Conduct for Law Enforcement Officials and the UN Basic Principles on the Use of Force and Firearms.

Human Rights Defenders

Mitsubishi recognizes the role that human rights defenders play in identifying business related human rights impacts. Mitsubishi's grievance mechanism (described under Question 5) is expressly open to individuals affected by Mitsubishi's business activities, to their representatives, and to organizations and groups active in related fields, and provides for confidentiality, for anonymous submissions and for a strict prohibition on any disadvantageous treatment of a person who raises a concern.

Question 5: Please provide information on steps taken by your company to establish and/or participate in operational-level grievance mechanisms, in line with the UN Guiding Principles, to effectively address the adverse human rights impacts caused by

and/or contributed to your company throughout your business activities and/or business relationships.

We have established grievance mechanisms in line with the UNGPs. These mechanisms enable stakeholders who are affected by, or hold concerns relating to, our activities to raise issues, which are then reviewed and addressed through appropriate investigation and, where necessary, corrective action. Where a grievance is identified, Mitsubishi's mechanisms enable that grievance to be addressed directly and at an early stage through prompt remediation, thereby preventing harms from compounding and grievances from escalating.

Mitsubishi's grievance mechanism is accessible to stakeholders, including (i) individuals adversely affected, in terms of human rights or the environment, by Mitsubishi's business activities; (ii) their representatives; (iii) organizations, groups or other entities with a direct relationship to affected individuals; and (iv) those without such a relationship but active in related fields. The Consultation Desk constitutes an avenue through which stakeholders may raise concerns regarding potential adverse human rights impacts caused by our business activities, and affords stakeholders an opportunity to seek remedies. The mechanism accepts anonymous reports, and strict confidentiality is maintained throughout the process, with access to report details restricted to those with proper grounds to view them. Any disadvantageous treatment of parties submitting a concern is strictly prohibited. Any report may be submitted online through our website free of charge and the process is clearly set out. These factors help to ensure that the grievance mechanism is readily accessible at an early stage to all stakeholders.

Upon receipt of an inquiry, Mitsubishi investigates and responds in accordance with a detailed process. This may consist of an in-depth investigation, on the basis of the findings of which remedial action will be taken to resolve or mitigate the adverse impact. The process is designed to be transparent and predictable, with applicants being informed of any responses, and is tailored to the local context, consistent with the UNGP effectiveness criteria.

For each reported case, the necessary investigations were conducted and, where applicable, Mitsubishi shared its perspective and engaged substantively in efforts towards resolution.

Conclusion

We trust that this provides the information you seek. We are grateful to the UN Special Rapporteurs for the opportunity to engage on the concerns raised in communication AL OTH 41/2026. The issues addressed are matters that we approach with seriousness and in good faith.

As a minority shareholder in CMA with a 10% equity interest, Mitsubishi's role is necessarily one of receiving information through governance channels and raising concerns where appropriate, rather than operational direction or active management of CMA's human rights practices. Within those boundaries, we are committed to building a continued, constructive dialogue with the Special Rapporteurs and remain available to provide any further information that may assist.

Sincerely,

Mitsubishi Corporation



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