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Basic Approach and Policies

Corporate activities are closely interlinked with various laws and public systems such as those related to the environment, labor, and consumer protection. Corporate activities must be carried out in compliance with these laws and systems.

MITSUBISHI MOTORS Group recognizes that the failure to appropriately comply with these laws, regulations, and systems would not only impede its business continuity, but would also place significant burdens on society and the environment.

In order to fulfill its social responsibilities as a company by not only complying with laws, international rules, and internal regulations but also by respecting changing social norms to the greatest degree possible, we have issued a "Global Code of Conduct" to serve as a standard of conduct for all executives and employees. We are also redoubling our efforts to enhance our compliance framework and employee training, including those at our major affiliates in Japan and overseas. We review the "Global Code of Conduct" as necessary.

(Reference) Global Code of Conduct

https://www.mitsubishi-motors.com/en/company/information/ philosophy/index.html

Management Structure

At MITSUBISHI MOTORS Group, we have established a compliance framework with the Executive Officer for Internal Control as the person responsible, overseeing, directing, and supervising all compliance activities. This officer also reports regularly to the Board of Directors on the status of compliance activities. In addition, each division appoints a compliance officer, and department heads serving as code leaders, to ensure a structured compliance system across the Company.

Compliance officers work closely with the code leaders to prevent compliance violations and information security

incidents, including those involving personal data. When a compliance violation occurs, compliance officers take corrective actions, establish measures to prevent recurrence and check its effectiveness, and implement horizontal dissemination, then report to the Executive Officer for Internal Control.

Major affiliates in Japan and overseas also appoint compliance officers. To help prevent compliance violations, we have established and operated MITSUBISHI MOTORS Global Hotline since FY2018.

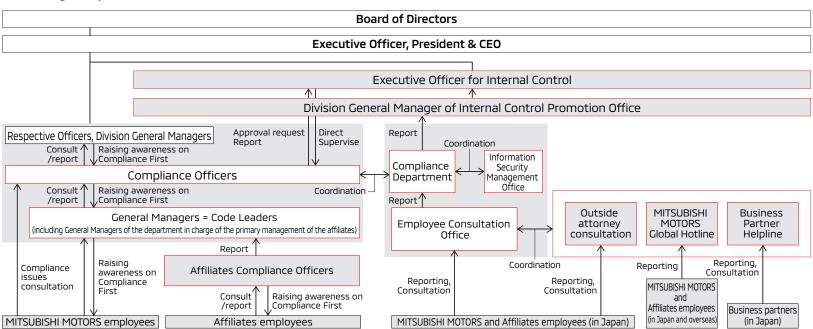
In the event of a serious incident, an emergency response organization is set up in accordance with the emergency

response manual, and a system is in place to ensure that appropriate measures are taken.

As for internal controls related to financial reporting, we verify compliance structures and financial closing procedures. If inadequate controls are found at those companies under evaluation, we request reporting on the nature of the problem and improvements being made. In FY2024, we checked the status of 18 Group companies (MITSUBISHI MOTORS, 6 domestic affiliates, and 11 overseas affiliates).

In FY2024, we experienced no serious compliance violations that might damage our credibility with customers, investors, or other parties.

Promoting Compliance Structure



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Establishment of Internal and External **Consultation Offices**

To prevent and promptly detect improper conduct, MITSUBISHI MOTORS has established several consultation offices allowing employees of us or its affiliates in Japan and overseas to report or consult about such conduct.

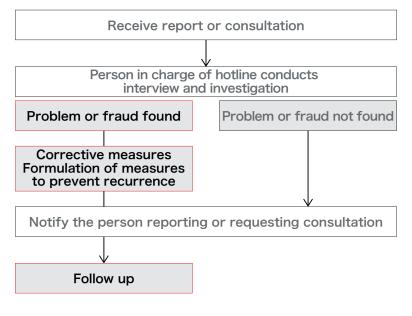
Out of total 136 reports and consultations received in FY2024, the results of the investigation revealed 4 cases of compliance issues, including violations of laws and regulations and harassment. We instructed the relevant departments to promptly take corrective actions and confirmed that they were implemented without fail.

(Reference) P44 Corrective Measures and Remediation for All Stakeholders

Employee Whistleblowing and Consultation Offices (Global)

Name	Contact point	Eligible persons	Key features
MITSUBISHI MOTORS Global Hotline	Outside	Group employees in Japan and overseas	 Initial intake handled by a specialist firm Hotlines established in 14 countries, available in 13 languages
Internal consultation office (Employee Consultation Office)	Internal	MITSUBISHI MOTORS and affiliates employees in Japan (including former employees)	Compliance Division serves as the contact point
MMC Hotline	Outside (attorneys)		Handled by an outside attorney

Response Flow After Reporting/Consultation



Number of Reports/Consultations Fielded by Consultation Offices by Category (FY2024)

Item	Number
Corporate/business proposals	18
Workplace environment	27
Labor relations	10
Human relations/harassment	43
Compliance, violations of operational rules, fraud	24
Others	14
Total	136

Education and Training (Japan)

Every fiscal year we formulate compliance-related education and training programs and offer them to employees stratified by each job rank. Each division also draws up and conducts its own measures under the direction of the compliance officer. On and around Safety Pledge Days,* each individual division voluntarily holds events to reaffirm the day's significance. Workplace discussions are also held at the same time to talk about compliance issues and workplace culture.

In addition, we regularly provide easy-to-understand compliance-related information by posting a Compliance Newsletter on our intranet.

* To prevent past incidents, such as the regrettable recall coverup, from being forgotten over time, we designated January 10 and October 19 as "Safety Pledge Days" in October 2004. These days were chosen because two fatal accidents involving large trucks manufactured by Mitsubishi Fuso, a former MITSUBISHI MOTORS division, occurred on these days.

Education and Training Record (FY2024)

Eligible persons	Training content	
Entry-level employees	MITSUBISHI MOTORS history of compliance issues and lessons learned	
Mid-career employees		
Newly promoted employees		
Employees of certain domestic affiliates		
Executives	Lecture by an outside expert on the impact of recent geopolitical and economic security trends on business	
General Manager level and above	Relationship between business and human rights and compliance	
All Employees (including part-time and contract employees)	e-Learning • Compliance basics • Information security • Labor management (including the 36 Agreement) • Relevant laws and regulations	

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Anti-Corruption

Policies and Approach

The "Global Code of Conduct" clearly stipulates that MITSUBISHI MOTORS executives and employees shall comply with laws and regulations and shall maintain fair and equitable relationships with public servants and business partners.

Additionally, we have formulated the "MITSUBISHI MOTORS GLOBAL ANTI-BRIBERY POLICY" as a global guideline for the prevention of bribery and corrupt practices. This policy clearly states that we tolerate absolutely no bribery or corrupt practices. Furthermore, this policy is also enforced at both domestic and overseas affiliates.

Main Initiatives

Anti-Bribery Initiatives

We have established management regulations and operational standards regarding the provision and receipt of gifts or business entertainment involving public servants. In particular, these management regulations and operational standards clearly state that prohibit the improper provision of such gifts or business entertainment to public servants or their receipt from public servants. We have put in place management and operational standards in addition to those for public servants. These standards expressly prohibit the provision of gifts or business entertainment that is illegal or goes beyond generally accepted bounds and the receipt of illicit payoffs.

We provide guidelines outlining the scope of exceptions for gifts and business entertainment, both of which must comply with laws and be deemed socially acceptable and require application to ensure transparent implementation. When providing gifts or business entertainment to public servants, a preemptive application must be made to the general manager

of the Legal Department, and must be provided only if approval is received.

In case these regulations or standards are violated, a system is in place for internal reporting and the formulation and implementation of measures to prevent recurrence.

Employee Training Initiatives

We conduct e-Learning programs on the Global Code of Conduct for all employees and distribute pamphlets containing the Code. For managers and above, a smartphone app is also provided to allow easy access for review at any time.

We also communicate the code across the Group, distributing the pamphlets to affiliates in Japan, and sharing the data electronically with affiliates overseas.

Initiatives Towards Business Partners

Under the "MITSUBISHI MOTORS GLOBAL ANTI-BRIBERY POLICY," we also ask our suppliers, contractors, procurement partners, dealers and outside agents to comply with applicable laws and regulations related to bribery and with individual companies' anti-bribery policies. We include specific provisions prohibiting bribery in our distributor agreements with overseas sales companies.

Internal Audits of Sales Subsidiaries

Since many employees in sales sites directly handle money with customers, there is a heightened risk of improper conduct such as embezzlement.

At our domestic sales subsidiaries we conduct regular education and training to instill thorough awareness of our compliance policies and prevent improper activity. Each sales subsidiary implements site audits regularly. As part of our internal auditing of affiliated companies in Japan, our Internal

Audit Division also conducts operational audits of domestic sales subsidiaries. Audit results are reported to our President & CEO, and the results are also shared with our Domestic Sales Division. We follow up the progress of action plans for improvement.

Initiatives at Overseas Affiliates

We work to thoroughly prevent corruption at overseas affiliates by assigning oversight to their executives and employees. Prior to their appointment, we provide training on legal risks, including the prohibition and prevention of corruption. Furthermore, when conducting audits of overseas affiliates, our Internal Audit Division also verifies the progress of efforts to prevent bribery and other corrupt practices.

(Reference) ESG Data "Governance" Anti-Corruption

https://www.mitsubishi-motors.com/en/sustainability/esg/report/pdf/report-2025/sustainability2025-esg-governance.xlsx

Political Involvement (Political Contributions)

We respect the requirements set forth in the Global Code of Conduct to "comply with all laws and rules," "be impartial and fair" and "be transparent and accountable," and maintain appropriate relationship with politics.

Recognizing that reasonable expenditures are required to appropriately maintain a democratic government, we consider making political contributions to be one aspect of its social responsibility. When making such contributions, we do so in accordance with the Public Offices Election Act, the Political Funds Control Act, and other laws and regulations related to politics. We also ensure to follow our own internal rules for approval.

(Reference) ESG Data "Governance" Political Contributions

https://www.mitsubishi-motors.com/en/sustainability/esg/report/pdf/report-2025/sustainability2025-esg-governance.xlsx

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MITSUBISHI MOTORS recognizes its social responsibility to adequately protect its important information assets (information and the IT systems, equipment, media, facilities, and products that handle this information) in the course of its business activities in order to gain the trust of all its stakeholders. We have established an information security policy and revised related information security regulations in FY2024 to ensure that the entire organization is prepared for increasingly diverse and sophisticated cyberattacks.

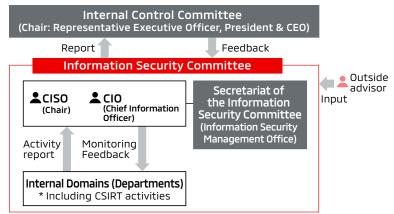
Promotion Framework

MITSUBISHI MOTORS have established the Information Security Committee, chaired by the Chief Information Security Officer (CISO), as a subordinate body under the Internal Control Committee. This committee determines key matters and policies related to information security management and monitors information security activities. Outside advisors also participate in the committee, allowing us to incorporate outside perspectives and further enhance our information security efforts.

In addition, the Company has established a CSIRT(*) to respond to security incidents and is working to build a robust information security framework.

* CSIRT: Computer Security Incident Response Team

Information Security Structure



Main Initiatives

- Putting in place and reviewing internal regulations related to information security
- Strengthening management of information assets and measures to counter ransomware due to malware infections and cyber attacks
- Regularly conducting drills based on the assumption of an information incident at CSIRT
- Providing employees with e-learning about information security, e-mail-based training, and alerts via our intranet
- Monitoring information security activities by the Information **Security Committee**
- Requesting suppliers to conduct the "JAMA/JAPIA Cybersecurity Guidelines Check Sheet" and calling for improvements from those whose measures are deemed insufficient

Product Cybersecurity

MITSUBISHI MOTORS Group recognizes that ensuring appropriate protection against external threats to our products, services, and associated IT assets throughout the vehicle lifecycle is essential for safeguarding our customers, road users, and products, as well as for the stable and proper execution of our operations. Accordingly, we are committed to maintaining robust vehicle cybersecurity management.

As part of this commitment, we have established a management system compliant with UN Regulation No. 155 (UNR155), the United Nations regulation on automotive cybersecurity, and are promoting cybersecurity efforts under the Vehicle Cybersecurity Representative Meeting.

In addition, to collect and analyze security-related information within the industry, we participate in the Auto-ISAC in both Japan and the United States, striving to enhance our cybersecurity quality.

Furthermore, we conduct annual internal audits by our internal audit division to ensure that cybersecurity initiatives are being properly implemented in accordance with the management system.

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Protection of Personal Information

The MITSUBISHI MOTORS Global Code of Conduct clearly states the importance of "compliance with laws and regulations," which includes those related to the protection of personal information. Based on our Privacy Policy, we have established an organizational response framework, compliance requirements for handling personal information, and a reporting line for information leakage incidents. The Chief Information Security Officer (CISO) oversees all activities related to personal information protection. In addition, rules on personal information protection tend to be strengthened around the world. We coordinate with our bases in individual countries, putting in place systems to respond appropriately with their laws and regulations on the protection of personal information.

When outsourcing the handling of personal information, the information manager selects and supervises contractors with appropriate security systems using a "Information Security Checklist." We also conduct ongoing education, such as through the use of e-learning for employees.

Reference

Privacy Policy

https://www.mitsubishi-motors.com/en/privacy/index.html

ESG Data "Governance" Number of appeals related to breaches of customer privacy or loss of customer data

https://www.mitsubishi-motors.com/en/sustainability/esg/report/pdf/report-2025/sustainability2025-esg-governance.xlsx

Security Export Control

We sincerely believe in the importance of strict security export controls to prevent the proliferation of weapons of mass destruction and the excessive accumulation of conventional weapons in order to maintain international peace and security.

To conduct strict export controls, we have established "Security Export Control Regulations." We ensure the legality of our export transactions through our management system, with the Security Export Control Committee, led by the Representative Executive Officer, President & CEO, who serves as chief security export control officer.

Approach to Taxation

We recognize that proper tax payment in all operating countries is one of key elements of corporate social responsibility for multinational companies.

We have established the following Global Tax Policy to promote tax compliance in business activities. In line with this policy, we have created a governance system and strive to maintain proper tax payments in compliance with international rules and national regulations.

(Reference) Global Tax Policy

https://www.mitsubishi-motors.com/en/sustainability/strategy/policy_quideline/index.html