

English translation approved by Itochu. The original response in Japanese can be downloaded below.

1. Does your company have investments or operations in Myanmar or is it seriously considering investing or operating there? If so, please provide information on the nature of these investments, and which geographic areas and communities they will affect.

There are offices in Yangon and Nay Pyi Taw, where the resident Japanese staff serves as office head. As a business area, it carries out transactions for energy, chemicals, metals, machineries, forest products & general merchandise, and textiles.

2. Do you have policies and procedures in place to prevent your business activities or investment from contributing to human rights abuse and social conflict in Myanmar (including, for example, human rights due diligence measures)? Please specify whether these policies and procedures apply to your company in general, or specifically to your Myanmar investment. If you have human rights policies and procedures regarding investing or operating in Myanmar, are you willing to share them for posting on our website? If so, please send them as a Word or PDF file, or, if available, as a hyperlink.

In ITOCHU's Basic Policies for CSR Promotion, "taking consideration of environment/human rights and strengthening supply chain management linked to the sustainable use of resources" is included as one of the 5 items.

As a concrete policy related to human rights, it is stipulated in the 10th Article of the ITOCHU Corporation's CSR Action Guidelines for Supply Chains that the human rights of

employees shall be respected; acts which violate human rights such as forced labor, discrimination and unjust wages shall not be carried out; and the regional environment shall be taken into consideration to avoid the occurrence of social conflicts. In accordance with this guide, the CSR Survey of Supply Chains and the CSR and Environmental Checklist for Investment are maintained and applied.

Reference: http://www.itochu.co.jp/en/csr/supply_chain/

Also, policies for the business activities at locations to be coexisting with local peoples and the appointment of a security firm are provided for as mentioned in the following URL below:

“Respecting the Rights of Indigenous Peoples” & “Approach to Engaging the Services of Security Firms”.

http://www.itochu.co.jp/en/csr/itochu/human_rights/

3. Who in your leadership is responsible for ensuring compliance with the policies and procedures in no. 2?

A Chief of CSR Committee

Reference: “Basic Policy on CSR and Promotion System”

<http://www.itochu.co.jp/en/csr/itochu/policy/>

4. If you do not yet have human rights policies and procedures in place, do you have plans to develop them? If so, what efforts are you currently engaged in or plan to engage in on this regard?

We have human rights policies.

5. How does your company try to prevent or mitigate conflicts that affect its operations or the surrounding communities (including armed conflict, inter-communal conflict and violence, etc.)? Could you please list your policies, procedures or concrete activities in this regard, including community engagement and dialogue measures and revenue sharing agreements?

This is complied with in accordance with the whole company's guidelines as indicated in Question 2.

6. Who should communities or civil society groups contact if they have questions or concerns about your investment or operations in Myanmar? Please provide their contact information.

Inquiries may be made through our company's homepage:

<http://www.itochu.co.jp/en/inquiry/>

7. We further invite you to respond to questions specific to your industry. Does your company have policies and procedures in place to address each of the following areas? If so, please provide details:

The company is signatory to the United Nations Global Compact, as shared in letters a to i below. The 10 principles of the United Nations Global Compact are observed.

http://www.itochu.co.jp/en/csr/itochu/global_compact/

a. Freedom of association and collective bargaining

Specified in the ITOCHU Corporation's CSR Action Guidelines for Supply Chains.

Reference: http://www.itochu.co.jp/en/csr/supply_chain/management/pdf/SC_e.pdf

Also included as an item in the CSR Survey of Supply Chains and the CSR and Environmental Checklist for Investments with checks practically applied.

b. Living wages

Specified in the ITOCHU Corporation's CSR Action Guidelines for Supply Chains.

Reference: http://www.itochu.co.jp/en/csr/supply_chain/management/pdf/SC_e.pdf

Also included as an item in the CSR Survey of Supply Chains and the CSR and Environmental Checklist for Investments with checks practically applied.

c. Workplace health and safety

Specified in the ITOCHU Corporation's CSR Action Guidelines for Supply Chains.

Reference: http://www.itochu.co.jp/en/csr/supply_chain/management/pdf/SC_e.pdf

Also included as an item in the CSR Survey of Supply Chains and the CSR and Environmental Checklist for Investments with checks practically applied.

d. Child Labour

Specified in the ITOCHU Corporation's CSR Action Guidelines for Supply Chains.

Reference: http://www.itochu.co.jp/en/csr/supply_chain/management/pdf/SC_e.pdf

Also included as an item in the CSR Survey of Supply Chains and the CSR and Environmental Checklist for Investments with checks practically applied.

e. Forced labour

Specified in the ITOCHU Corporation's CSR Action Guidelines for Supply Chains.

Reference: http://www.itochu.co.jp/en/csr/supply_chain/management/pdf/SC_e.pdf

Also included as an item in the CSR Survey of Supply Chains and the CSR and Environmental Checklist for Investments with checks practically applied.

f. Anti-discrimination (whether based on race, gender, religion, nationality, etc.)

Specified in the ITOCHU Corporation's CSR Action Guidelines for Supply Chains.

Reference: http://www.itochu.co.jp/en/csr/supply_chain/management/pdf/SC_e.pdf

Also included as an item in the CSR Survey of Supply Chains and the CSR and Environmental Checklist for Investments with checks practically applied.

g. Environment

Specified in the ITOCHU Corporation's CSR Action Guidelines for Supply Chains and the Environmental Policy of the ITOCHU Group.

Reference:

http://www.itochu.co.jp/en/csr/supply_chain/management/pdf/SC_e.pdf

Environmental Policy Of the ITOCHU Group:

<http://www.itochu.co.jp/en/csr/environment/policy/>

Also included as an item in the CSR Survey of Supply Chains and the CSR and Environmental Checklist for Investment with checks practically applied.

h. Land rights

Specified in the ITOCHU Corporation's CSR Action Guidelines for Supply Chains.

Reference: http://www.itochu.co.jp/en/csr/supply_chain/management/pdf/SC_e.pdf

Included in the CSR and Environmental Checklist for Investment, such as checking for soil contamination and communication with regional inhabitants.

Reference: "Respect for Human Rights in Business Activities"

http://www.itochu.co.jp/en/csr/itochu/human_rights/

i. Relocation

Specified in the ITOCHU Corporation's CSR Action Guidelines for Supply Chains.

Reference: http://www.itochu.co.jp/en/csr/supply_chain/management/pdf/SC_e.pdf

Also included as an item in the CSR and Environmental Checklist for Investment with checks practically applied.

Reference: Refer to "Respect for Human Rights in Business Activities"

http://www.itochu.co.jp/en/csr/itochu/human_rights/