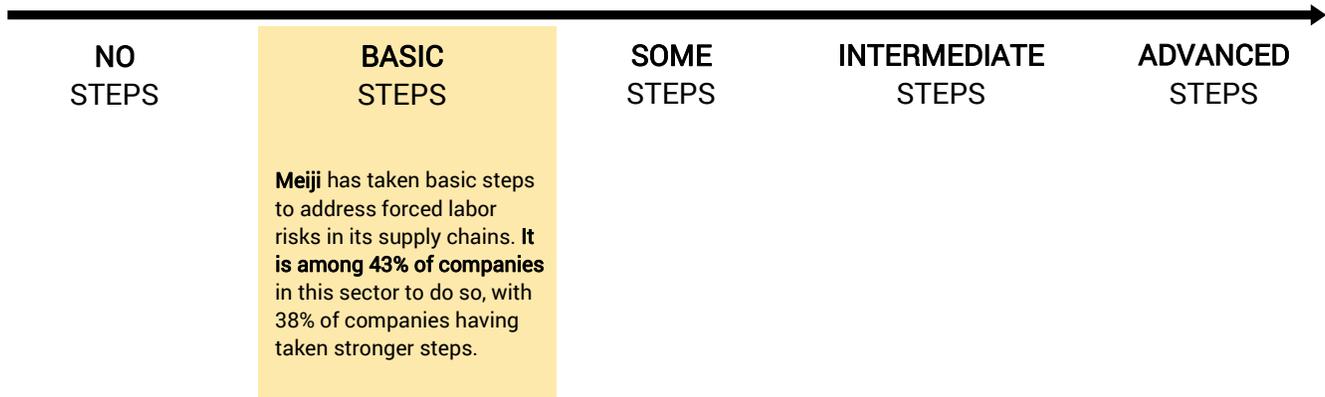


Meiji Holdings Co. Ltd.

| | | |
|---|--|------------------------------|
| TICKER TKS:2269 | MARKET CAPITALIZATION US\$11 billion | HEADQUARTERS Japan |
| DISCLOSURES <u>UK Modern Slavery Act</u> : Yes <u>California Transparency in Supply Chains Act</u> : Yes | | TARGETS None |

Meiji Holdings Co. Ltd. (Meiji), the fourth-largest global chocolate manufacturer,¹ is a holding company whose subsidiaries manufacture food products, including dairy products and confectionery. The company has taken basic steps to address forced labor risks in its supply chains and discloses less information than the global sector average. Other food companies from Asia, such as Wilmar, and other chocolate manufacturers, such as Mondelez or Nestlé, disclose taking stronger steps.

STEPS TAKEN TO ADDRESS FORCED LABOR RISKS IN SUPPLY CHAINS



SUPPLY CHAIN TRANSPARENCY

| | |
|-------------------------------------|--|
| Supplier List | Yes (milk only) |
| Information on Supply Chain Workers | <input checked="" type="checkbox"/> No |

HIGH-RISK COMMODITIES

Cocoa, soybeans, palm oil, and others²

SUBSET OF INDICATORS

| | <input type="radio"/> NOT MET <input type="radio"/> PARTIALLY MET <input checked="" type="radio"/> MET | Policy / Process | Outcomes |
|--|--|----------------------------------|-----------------------|
| Supplier Code of Conduct and Integration into Supplier Contracts | <input checked="" type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Management and Accountability | <input type="radio"/> | <input type="radio"/> | Not Applicable |
| Internal Management | <input type="radio"/> | <input checked="" type="radio"/> | |
| Board Oversight | <input checked="" type="radio"/> | <input checked="" type="radio"/> | |
| Stakeholder Engagement | <input type="radio"/> | <input type="radio"/> | Not Applicable |
| Local Stakeholders | <input type="radio"/> | <input type="radio"/> | |
| Peers | <input type="radio"/> | <input type="radio"/> | |
| Risk Assessment | <input checked="" type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Purchasing Practices | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Recruitment Fees | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Freedom of Association | <input type="radio"/> | <input type="radio"/> | Not Applicable |
| Working with Unions | <input type="radio"/> | <input type="radio"/> | |
| Examples of Improvements | <input type="radio"/> | <input type="radio"/> | |
| Grievance Mechanism | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Remedy Programs / Response to Allegations | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

For example, Meiji has adopted policies that prohibit the use of forced labor in its supply chains, and it discloses board oversight of its supply chain policies covering forced labor, the names of its milk suppliers and its cocoa-sourcing countries, and a human rights due diligence process for six of its raw materials.

Additional steps the company could take include

- disclosing internal responsibility for implementing its supply chain policies (beyond the responsibility it discloses for sustainability issues more broadly);
- engaging with local stakeholders (such as trade unions or worker organizations) and peers to address forced labor risks; and
- ensuring that a mechanism to report grievances regarding labor conditions is available to workers in its supply chains.

COMPANY ENGAGED WITH KNOWTHECHAIN

Yes ([Provided Additional Disclosure](#)).

¹ International Cocoa Organization (last updated 14 April 2020), "[Who are the main manufacturers of chocolate in the world?](#)" and BizVibe (2 July 2020), "[Global Chocolate Industry Factsheet 2020: Top 10 Largest Chocolate Companies in World](#)."

² The US Department of Labor lists these commodities as commodities that may be produced using forced labor. US Department of Labor (20 September 2018), "[List of Goods Produced by Child Labor or Forced Labor](#)."