

## Sumitomo Corporation

### Slavery and Human Trafficking Statement for the Fiscal Year 2024

Sumitomo Corporation (SC) is committed to improving its practices to prevent modern slavery including forced labour, child labour and human trafficking. We hereby provide this statement for the fiscal year 2024 (from April 1 to March 31, 2025), in accordance with Section 54 of the [Modern Slavery Act 2015 of the UK](#). This statement was approved by the board of directors of SC on August 28, 2025.

#### 1. Background and organisational structure

SC is an integrated corporate committed to business activities in a wide range of industries with over 120 offices and subsidiaries in over 60 countries and a network of around 900 group companies worldwide. With its global network and based on trust from companies in various industries and from consumers, SC engages in multifaceted business activities by making the most of its integrated corporate strength. These business activities include sales of a variety of products and services within Japan, import and export, trilateral trade, and domestic and international business investments. SC employs over 5,000 people.

For more information on SC's business overview, please visit the following link:

<https://www.sumitomocorp.com/en/jp/about>

#### 2. Our Policies, Guidelines and Initiatives to respect human rights

● At the core of SC lies [Sumitomo's Business Philosophy](#), which has been passed down and followed faithfully for more than 400 years since Masatomo Sumitomo (1585-1652) had founded. [SC Group's Corporate Mission Statement \(Management Principles and Activity Guidelines\)](#) is based on this philosophy and represents our fundamental and ultimate value standard. In the Corporate Mission Statement, it clearly states that we respect the personality of each individual and places prime importance on integrity and sound management. Our corporate message "Enriching lives and the world" represents our pledge to further enrich the world, society, and people's lives through sound business activities.

Furthermore, in order to achieve sustainable growth for SC Group through resolving social issues, we formulated our "Material Issues" in 2017 and set "Key Social Issues" and each goal for working on our business activities in 2020. In 2024, we conducted a review of the "Material Issues" and "Key Social Issues" and integrated them into an updated "Material Issues". ["Material Issues"](#) are medium- to long- term commitment for SC Group to take one step further toward addressing key social challenges that we must undertake. SC Group will achieve sustainable growth through addressing the social

challenges. We have set "Respect human rights" as one aspect of "[Material Issues](#)". We will continue to promote these efforts and disclose our progress.

● We take its commitment to tackling modern slavery including forced labour, child labour and human trafficking very seriously. The followings are policies, guidelines, and the initiatives which SC has established and taken to help ensure that modern slavery including forced labour, child labour and human trafficking are not taking place in SC's business or supply chains:

- [SC Group's Human Rights Policy](#)

We respect [the International Bill of Human Rights](#) and [the International Labour Organization \(ILO\)'s Declaration on Fundamental Principles and Rights at Work](#), and we operate in accordance with [the United Nations \(UN\) Guiding Principles on Business and Human Rights](#).

In line with [SC Group's Human Rights Policy](#), i) we strive to identify and to prevent or mitigate any adverse impact on human rights through the implementation of human rights due diligence processes, ii) where we identify that our group's practices have caused or contributed to an adverse impact on human rights, we will endeavor to take appropriate remedial measures, iii) we will seek to improve and progress human rights measures through engagement and dialogue with relevant stakeholders, and so on.

With regards to "Respect human rights" which is one of our [Material Issues](#), one of our medium-term goals is "promote and ensure respect for human rights in accordance with the UN Guiding Principles on Business and Human Rights and SC Group's Human Rights Policy."

- *Remedy (Grievance Mechanism)*

Also, in addition to an internal whistleblower system for employees, we have set up a contact point on our website to accept opinions from external stakeholders. Specifically, we have become a regular member of the Japan Center for Engagement and Remedy on Business and Human Rights (JaCER), a general incorporated association that provides a platform for redress of grievances in compliance with the UN Guiding Principles on Business and Human Rights, and we accept various opinions on human rights from our external stakeholders on [the platform provided by JaCER](#). We accept opinions through a third party with expertise to improve fairness and transparency. Besides, the content of grievance is reported to the management, including Chief Sustainability, DE&I Officer and the Corporate Sustainability Committee, to ensure that issues are corrected and prevented from recurrence in a timely and appropriate manner. In dealing with the report, we ensure that the whistleblower and related parties will not suffer any disadvantages as a result of reporting, and we protect the privacy and confidentiality of the whistleblower. The progress and results of the response to the received report will be disclosed on the Grievance List on the JaCER website.

- [\*The SC Group CSR Action Guidelines for Supply Chain Management\*](#)

We have established [the SC Group CSR Action Guidelines for Supply Chain Management](#). Through the implementation of these guidelines, we are aiming to realize a sustainable society by working together with our suppliers, business partners and contractors, etc. to achieve responsible value chain management. As part of these guidelines, we set out its values to “Respect for human rights and not to be complicit in human rights abuses” and to “Prevent forced labour, child labour and the payment of unfairly low wages.” These principles establish the overarching guidelines encompassing our commitment to preventing modern slavery including forced labour, child labour and human trafficking.

In the event that we find violations of these guidelines in our supply chains, we will urge the suppliers, business partners or contractors, etc. to remedy and improve the situation, while providing support to them as needed. However, if there are no improvements to the situation by them, we will consider carefully whether to continue our business with them or not.

In fiscal 2021, we also established [the SC Group Forest Management Policy](#) and [the SC Group Sourcing Policy for Forest Products](#) as specific policies for natural resource-related commodities requiring sustainable procurement. The policies include our commitment to respect human rights by operating forest related businesses in accordance with [SC Group’s Human Rights Policy](#) as well as [the UN Guiding Principles on Business and Human Rights](#).

- [\*Human Rights Due Diligence\*](#)

In accordance with [SC Group’s Human Rights Policy](#), we began human rights due diligence in fiscal 2020 to identify, prevent, mitigate any adverse human rights impact that SC Group’s business activities may cause or contribute to.

Our human rights due diligence is conducted through a process in accordance with international guidelines including [the UN Guiding Principles on Business and Human Rights](#), [the UN Guiding Principles Reporting Framework](#), and [OECD Due Diligence Guidance for Responsible Business Conduct](#). As a first step in fiscal 2020, we identified eight salient human rights issues that should be addressed with priority so that we can assess impacts concerning human rights throughout SC Group, by the desktop survey, interviews of experts on business and human rights and internal interviews.

The identified eight salient human rights issues are as follows;

Labour conditions (wages and working hours), Freedom of association and the right to collective bargaining, Forced labour and child labour, Occupational health and safety, Health and safety of local residents, Land rights, Discrimination and harassment, and Personal information and privacy.

We believe that the human rights of workers throughout the supply chain including SC Group’s employees are essential as the foundations of business. In addition to ‘Freedom of association and collective bargaining rights’, ‘Forced labour and child labour’, ‘Discrimination and harassment’ and ‘Occupational health and safety’, which are related

to [the five core labour standards of the ILO](#), we also take action to address ‘Labour conditions’. SC engages in business with strong ties in local communities centered on the infrastructure business and resource development, and we have a responsibility to protect ‘Health and safety of local residents’ and ‘Land rights’. Moreover, since SC engages in wide-ranging business, we have positioned ‘Personal information and privacy’ of stakeholders including customers as a priority issue.

We started conducting [human rights due diligence](#) by business unit since fiscal 2021. From fiscal 2021 to fiscal 2024, we interviewed all SBUs (Strategic Business Units) with the support from outside experts to confirm the actual business situation and actual examples including the impact on stakeholders, such as local residents and others related to the supply chain and business activities of each business. We also identified anticipated potential risks and discussed how those risks would be taken care of. Based on the result of the interview, we identified SBUs, or individual businesses within SBUs which should be prioritized in their efforts to reduce human rights risks, from the perspective of the likelihood of such risks occurring and the severity of the risks if it did occur. Corporate Sustainability Department and relevant SBUs and group companies are now considering and implementing specific measures to prevent or mitigate the identified human rights risks.

Having completed a round of human rights due diligence across all businesses, we will adopt a risk-based approach by implementing enhanced human rights due diligence, including engagement with rights holders. In order to undertake human rights due diligence using a risk-based approach going forward, it is necessary to identify business with human rights risks. Therefore, in fiscal 2024, we conducted company-wide risk mapping based on matters such as the results of human rights due diligence to date as well as the characteristics and risks of each business. Specifically, based on the OECD's due diligence guidance, we took into consideration four risk factors (sector, product, geographic, and enterprise-level) and sought the opinions of outside experts including Sustainability Advisory Board members to identify business areas within the business group that pose high human rights risks.

(Please refer to our website for the results of the human rights due diligence to date.)

Timelines and ways of responding to human rights risks vary according to number of factors, including the severity of the risks and their level of involvement in each business. For this reason, each SBU should be responsible, along with its group companies, for their related human rights risks. For those risks which we identified and assessed through our human rights due diligence, each SBU prioritizes the risks based on their severity of the impact, incorporate them into concrete action plans, and implement the plan-do-check-act (PDCA) cycle. The progress of these initiatives will continuously be monitored and followed-up as concrete initiatives aiming to achieve the long-term and medium-term materiality goals and will be regularly reported to the Management Council and the Board of Directors from the Corporate Sustainability Committee for further discussion.

- [Group Governance](#)

We have established a Group Management Policy (GMP) that is to respect "Jiritsu"\* management by each group company, and to be involved in important decision-making at the board of directors or organization equivalent to the board of directors of each group company based on the relationship of trust established through active "Dialogue" as a shareholder, and to create new value through strong "Collaboration" of each group company including SC.

SC supports the establishment and operation of an optimal management system to control risks appropriately and increase the odds of achieving its business strategies for Jiritsu management of each group company. Specifically, we have introduced a governance framework that uses SC Group standard tool called Basic Elements to visualize the internal control status of each group company and solve issues identified through "dialogue" with SC.

The Basic Elements include "Respect for Human Rights", "Response to workplace accidents", "Labour Management, Health, Safety and the Environment", and "Supplier Management", and if there are issues, we formulate a response policy according to its business nature and regional conditions. Through regular monitoring, we will continue working to prevent modern slavery including forced labour, child labour and human trafficking in SC Group's business or supply chains through further enhancing governance considering its business nature and regional conditions.

In addition, based on the concept of Jiritsu management, each group company to which the Modern Slavery Act 2015 of the UK applies prepares and publishes its own statement. SC provides necessary support to the group companies in complying with the law, including making decisions on the application of the law and preparing statements.

\*"Jiritsu" is a Japanese term. In GMP, we define it to mean "following the rules necessary for the management of each group company, such as SC Group's management principles, strategies, and policies, to discipline oneself, to think, make decisions, act for oneself in order to achieve goals, and to be accountable to stakeholders".

- [Social and Environmental Risk Management in Individual Project](#)

In order to promote social and environmental risk management for each business, taking into account the nature of the business and the characteristics of the region where it operates, we established a management system that considers social and environmental impacts including human rights issues when making decision on a new investment, by utilizing an assessment sheet for social and environmental risks.

After the implementation of each investment, we monitor the status of social and environmental risk management and if any issues arise, we will work for improvements according to the characteristics of the business.

- [Active commitment to the UN Global Compact](#)

We signed [the UN Global Compact](#) and declared its support for the 10 principles in March 2009. This international sustainability related initiative shares the same values as our Corporate Mission Statement. With our participation in the Global Compact, we have committed ourselves to further increasing corporate value by constantly seeking out areas of our business activities that can be improved in light of the values advocated by the 10 principles. The UN Global Compact has been referred also through the internal auditing process of SC Group.

SC participates as a member company of the Global Compact Network Japan, a local network of the UN Global Compact.

- [\*Training\*](#)

In fiscal 2024, SC conducted training for new employees, chiefs, managers, team leaders, and general managers on our sustainability promotion, including respect for human rights. We have rolled out e-learning with respect to the necessity of respecting human rights throughout the supply chain and human rights issues that require attention in conducting business activities to all employees on a non-consolidated basis, and expanded and completed such initiatives to cover overseas regional organizations and consolidated subsidiaries in fiscal 2024.

Since SC conducts a wide range of business in multiple sectors, the associated risks vary, however the eradication of any instances of modern slavery including forced labour, child labour and human trafficking remains a key priority.

We will continue to undertake these efforts aimed at ensuring that no modern slavery including forced labour, child labour or human trafficking of any form exists in our business and supply chains.

September 1, 2025

Signed by:

Takayuki Seishima  
Representative Director,  
Executive Vice President,  
Sumitomo Corporation