

Sumitomo Corporation Group

Slavery and Human Trafficking Statement for the Fiscal Year 2020

Sumitomo Corporation (SC) Group is committed to improving its practices to combat modern slavery and human trafficking. This statement has been published in accordance with [the UK Modern Slavery Act 2015](#) and constitutes SC Group's modern slavery and human trafficking statement for the fiscal year 2020 ended March 31, 2021. The statement has been approved by the board of directors of SC as the parent company of SC Group every year. This statement was approved by the board of directors of SC on August 30, 2021.

Background and organisational structure

SC Group is an integrated corporate group committed to business activities in a wide range of industries with over 130 offices and subsidiaries in over 60 countries and a network of over 900 group companies worldwide. With its global network and based on trust from companies in various industries and from consumers, SC Group 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 Group employs over 70,000 people.

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

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

Steps taken to ensure that modern slavery and human trafficking are not taking place in SC Group's business and supply chains

At the core of SC Group 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. [Our Corporate Mission Statement \(Management Principles and Activity Guidelines\)](#) is based on this philosophy and represents SC Group's fundamental and ultimate value standard. In the Corporate Mission Statement, it clearly states that SC Group respects the personality of each individual and places prime importance on integrity and sound management.

We also identified our [“Six Material Issues to Achieve Sustainable Growth with Society”](#) in 2017, a set of social issues that SC Group regards as important and should prioritize addressing through its business activities as well as the challenges SC Group needs to

overcome in creating solutions. SC Group positions these material issues as an important factor in developing business strategies and in the decision-making process for individual businesses.

To enhance our sustainability management, we have identified our [“Six Key Social Issues and the Long-term Goals”](#) in 2020. The six key social issues are related to our business that we address through our business and corporate activities and consist of two themes: the sustainability of society and development and evolution of society. As one of the six key social issues, we have set "respect for human rights" and "to respect human rights through all of our businesses and supply chains" as its long-term target.

In addition to the long-term goals, we will further determine [medium-term targets and KPIs](#), which will guide us in addressing these social issues in a quantifiable way. In the interest of accountability, our progress will be monitored and disclosed to its stakeholders.

SC Group takes its commitment to tackling modern slavery and human trafficking very seriously. We set out below the steps SC Group has taken to help ensure that modern slavery and human trafficking are not taking place in SC Group’s business or supply chains:

[*SC Group’s Human Rights Policy*](#)

We respect [“the International Bill of Human Rights”](#) and [the International Labor Organization’s “Declaration on Fundamental Principles and Rights at Work”](#), and we operate in accordance with [“the United Nations 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.

Human Rights Due Diligence

In accordance with [the SC Group Human Rights Policy](#), we began human rights due diligence in 2020 so that we can identify, prevent, mitigate and account for how we address any adverse human rights impact that SC Group business activities may cause or contribute to.

Our human rights due diligence is conducted through a process in accordance with international guidelines including [the United Nations Guiding Principles on Business and Human Rights](#), [United Nations Guiding Principles Reporting Framework](#), and [OECD Due Diligence Guidance for Responsible Business Conduct](#). As a first step in 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.

Identified eight salient human rights issues are as follows ;

Labor conditions (wages and working hours), Freedom of association and the right to collective bargaining, Forced labor and child labor, 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 employees are essential as the foundations of business. In addition to the freedom of association and collective bargaining rights, forced labor and child labor, and discrimination and harassment, which are related to [the four core labor standards of the International Labour Organization \(ILO\)](#), we also take action to address labor conditions and occupational health and safety. SC Group engages in business with strong ties in local communities centered on the infrastructure business and resource development, and we have a responsibility to protect the health and safety of local residents and land rights. Moreover, since SC Group engages in wide-ranging business, we have positioned the personal information and privacy of stakeholders including customers as priority issues.

For each of these issues, we will investigate and carry out action plans to prevent and mitigate specific risks with priority on areas of high risk in SC Group's business.

[SC Group's 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 labor, child labor and the payment of unfairly low wages." These principles establish the overarching guidelines encompassing our commitment to combating modern slavery 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.

[Enhancement of SC Group Governance](#)

In order to embody "Management base SHIFT" in [the Medium-Term Management Plan SHIFT 2023](#), we are working on "Enhancement of SC Group Governance" aiming to

improve business quality and corporate value through internal control for all consolidated subsidiaries. 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 the parent company.

The Basic Elements include “Respect for Human Rights”, “Labor 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 and human trafficking in SC Group’s business or supply chains through further enhancing governance considering its business nature and regional conditions.

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 when making decision on a new investment, by utilizing an assessment sheet for social and environmental risks, and by having the Corporate Sustainability Department, a specialized organization for social and environmental issues, participate in the process of deliberations.

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 as the parent company of SC Group. 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.

[Training](#)

In order to raise our awareness especially about modern slavery, we have utilized an American NGO Verite's free e-Learning of Supply Chain Accountability on forced labor and human trafficking as a useful training material, which is one of the referred tools on ['Transparency in Supply Chains: A Practical guide' published by UK Home Office](#).

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

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

September 27, 2021

Signed by:

Hideki Yamano
Representative Director,
Senior Managing Executive Officer,
Chief Strategy Officer and Chief Information Officer
Sumitomo Corporation

This statement covers the following consolidated subsidiaries, and please refer to the appendix for each company's initiatives;

- Edgen Group Inc.
- Edgen Murray Europe Ltd.
- Eryngium Ltd.
- Fyffes Group Ltd.
- Fyffes Ltd.
- Fyffes Tropical (Ireland) Ltd.
- Howco Group Plc
- Kienle + Spiess GmbH
- Moto-Pfohe Eood
- Pacific Summit Energy LLC
- SC Foods Co., Ltd.
- Sumi Agro Europe Ltd.
- Sumi Agro Ltd.
- Sumisho Aero-Systems Corporation
- Sumisho Global Logistics Co., Ltd.
- Sumitomo Corporation Power & Mobility Co., Ltd.
- Sumitomo Corporation Asia & Oceania Pte. Ltd.
- Sumitomo Corporation Europe Ltd.
- Sumitomo Corporation Global Commodities Ltd
- Sumitomo Corporation Middle East FZE
- Sumitomo Corporation of Americas
- Sumitomo Corporation Saudi Arabia Ltd.
- Sumitomo Corporation (Shanghai) Ltd.
- Sumitomo Deutschland GmbH

- Sumitomo Shoji Chemicals Co., Ltd.
- Summit Agro International Ltd.
- Summit Exploration and Production Ltd.
- Summit Energy & Resources Pte. Ltd.
- Summit Motors Ljubljana, Export-Import-Distribucija, D.O.O.
- Summit Motors Slovakia, Spol.S.R.O.
- Summit Pharmaceuticals Europe Srl.
- Summit Pharmaceuticals International Corporation
- Tecnologia Para la Construccion Y Minería S.L.

Appendix. Initiatives of each Sumitomo Corporation Group company to eradicate modern slavery

Sumitomo Corporation	<p>In addition to the initiatives that covers Sumitomo Corporation (SC) Group described in the SC Group Statement, SC is addressing following individual initiatives:</p> <ol style="list-style-type: none"> 1) Active participation as a board member company of the Global Compact Network Japan, a local network of the United Nations Global Compact 2) In 2020, SC conducted training for 155 new employees, 85 new managers, 59 new team leaders, and 33 new general managers on sustainability promotion, including respect for human rights. And also, we created our own e-Learning related to business and human rights, and 5,234 people including group employees mainly with SC executives and employees, completed the training. In 2020, we added the same e-Learning to the Global e-SBC training menu for overseas staffs and promoted learning. https://www.sumitomocorp.com/en/jp/sustainability/csr#03
Fyffes Ltd. Fyffes Group Ltd. Fyffes Tropical (Ireland) Ltd.	<p>As a group of Fyffes Ltd., while acknowledging the SC Group's statement and complying with the California Supply Chain Transparency Act, the company's statement approved by the company's board of directors has been posted on its website (https://www.fyffes.com/modern-day-slavery/).</p> <ol style="list-style-type: none"> 1) All of Fyffes compliance team have been trained in SMETA and apply its methodology in their regular internal audits. Conducting SMETA type audits in the supply chain. The majority of its suppliers (246 sites) are SEDEX members. All of Fyffes ripening facilities were subject to unannounced SMETA audits during the year. 2) Fyffes Group Ltd continues to audit its labour providers using a standard developed in 2016, looking at how the labour provider recruits and treats the workers. 3) In 2020, Fyffes suspended one supplier with poor results to encourage them to improve their compliance. Once the supplier had reached a satisfactory level of compliance, we recommenced buying from this supplier. 4) In 2019, Fyffes rolled-out `Fyffes Responsible Business Conduct Principles` (https://www.fyffes.com/our-story/our-business/#our-principles), including the requirement to be vigilant regarding coercive labour, human trafficking and child labour and to immediately report any suspicions of such activity. In 2020, Fyffes began training all employees in the Fyffes Principles and also extended the Fyffes Principles to all long-term consultants and major suppliers. In 2019 Fyffes launched a grievance mechanism made available to both internal and external stakeholders, called 'the Fyffes Ethics Hotline', an independent, confidential online and telephone hotline for reporting unethical behaviour by a Fyffes employee. (https://secure.ethicspoint.com/domain/media/en/gui/56812/index.html) 5) Fyffes is the largest supplier of certified Fairtrade bananas in the world and has a significant number of Fairtrade melons distributed in the United States. All the pineapples sold by Fyffes are certified by Rainforest Alliance, while for bananas, in 2019 this represented approximately 25%. 6) Rolling-out a 'Global Human Rights Policy and Statement' (https://www.fyffes.com/sustainability/policy-documents/) and bringing it to life through training and internal protocols. Fyffes has a public target to train all employees and contractors, including 100% of its supply chain in human rights by 2030. 7) Fyffes is making progress on implementing the 11 mitigation actions to address the 13 salient risk identified in Fyffes first human rights impact assessment (https://www.fyffes.com/news/fyffes-announces-its-human-rights-mitigation-action-plan/) concluded in 2019. Fyffes has created a human rights core team to address and track progress in each area. 8) To prevent child labour, Fyffes strict rules in place and in general do not encounter child labour on our own operations. However, to ensure smallholders do not have child labour, for example in the circumstance that a parent brings their child to work, Fyffes developed a Child Labour Remediation Protocol during 2020. Compliance personnel, auditors, human resources personnel and farm managers are trained on the Protocol so Fyffes can take swift action in the event of the discovery of a child in the workplace. 9) In 2020, Fyffes joined the Red de Empresas Contra el Trabajo Infantil de Costa Rica (Network of Companies Against Child Labour of Costa Rica). The Network's members pledge to defend and promote the rights of the underage working population; especially, the right to education, health and development.
Edgen Group Inc.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. No company website
Edgen Murray Europe Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.edgenmurray.com
Eryngium Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. No company website
Howco Group Plc	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.howcogroup.com/inside-howco/corporate-citizenship
Kienle + Spiess GmbH	Signing by two Managing Directors to the SC Group's statement, and its importance and purpose were recognized by its senior management. Link to SC group statement in Downloads area on the company's website. https://www.kienle-spiess.de/kienle-spiess-home-en.html
Moto-Pfohe Eood	Signing by two Managing Directors to the SC Group's statement, and its importance and purpose were recognized by its senior management. https://www.motopfohe.bg/en/about-us/our-slavery-and-human-trafficking-statement
Pacific Summit Energy LLC	The SC Group's statement was endorsed by the company's senior management committee, and its importance and purpose were recognized by its senior management. http://pacificsummitenergy.com/who-we-are/
SC Foods Co., Ltd.	<p>The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management.</p> <p>In addition, as the company's own initiatives,</p> <ol style="list-style-type: none"> 1) Added "Human rights, occupational safety and environmental protection" to the survey items in the "Quality Control Status Preliminary Survey Table" for inspection materials at supplier factories, etc. (ex. Confirmation of age by public documents and contents of employment contract) 2) Applying 1) to new suppliers, and existing supplier is checked at the time of regular factory survey http://www.sfoods.co.jp/english/aboutus/outline.html

Sumi Agro Europe Ltd. Sumi Agro Ltd.	While acknowledging the SC Group's statement, the company's statement approved by the company's board of directors has been posted on the company's website. 1) Adopting the SC Group CSR Action Guidelines as an official "SAE Group Rule" to reinforce the awareness to the CSR Action Guideline among the SAE Group employees and executives. 2) Requesting all suppliers to acknowledge and confirm that the products supplied to the SAE Group are produced in compliance with the CSR Action Guidelines. 3) Holding training sessions with employees regarding the principles to be followed to mitigate the risks of slavery and human trafficking in supply chains and the business. 4) Encouraging employees to identify and report potential violations of the CSR Action Guidelines and to report suspicious activities relating to slavery and human trafficking. 5) All employees and executives of SAE took the Verite's Free E-Learning courses 6) Encouraging senior managements regularly to put the priority on compliance including raising the awareness on the importance to prevent the modern slavery and human trafficking in SAE Group's business or supply chains and the necessity to compliance with the Act through monthly managements meeting which was launched in 2020. http://www.sumiagro.com/
Sumisho Aero-Systems Corporation	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.sc-aero.co.jp/english/who-we-are/index.html
Sumisho Global Logistics Co., Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. http://www.sglogi.co.jp/english/about_us/index.html
Sumitomo Corporation Power & Mobility Co., Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.sc-pmco.com/en/company/csr/
Sumitomo Corporation Asia & Oceania Pte. Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.sumitomocorp.com/en/asia-oceania/sustainability/csr#03
Sumitomo Corporation Europe Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.sumitomocorp.com/en/europe/sceu/csr#02
Sumitomo Corporation Global Commodities Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. No company website
Sumitomo Corporation Middle East FZE	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.sumitomocorp.com/en/mideast/sustainability/csr#03
Sumitomo Corporation of Americas	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. SCOA's zero-tolerance policy "Human Trafficking Policy" against all forms of human trafficking and related activities. https://www.sumitomocorp.com/en/us/sustainability/csr#03
Sumitomo Corporation Saudi Arabia Ltd.	Signing by the Managing Director to the SC Group's statement, and its importance and purpose were recognized by its senior management. https://www.sumitomocorp.com/en/mideast/sustainability/csr#03
Sumitomo Corporation (Shanghai) Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. Promoting to take SC Group's e-Learning on business and human rights (Chinese version) within SC China Group. https://www.sumitomocorp.com/en/easia/sustainability/csr#03
Sumitomo Deutschland GmbH	Signing by the Managing Director to the SC Group's statement, and its importance and purpose were recognized by its senior management. https://www.sumitomocorp.com/en/europe/sceu/csr#02
Sumitomo Shoji Chemicals Co., Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.sc-chem.co.jp/en/sustainability/csr/
Summit Agro International Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. http://www.summit-agro.co.jp/english/company/contribution.html
Summit Energy & Resources Pte. Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. No company website
Summit Exploration and Production Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://summiteandp.com/modern-slavery-statement/
Summit Motors Ljubljana, Export-Import-Distribucija, D.O.O.	Signing by the Managing Director to the SC Group's statement, and its importance and purpose were recognized by its senior management. https://www.summitavto.si/en/about/social-responsibility
Summit Motors Slovakia, Spol.S.R.O.	Signing by the Managing Director to the SC Group's statement, and its importance and purpose were recognized by its senior management. https://summitmotorsba.sk/
Summit Pharmaceuticals Europe Srl.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://summitpharmaeurope.com/about-us/our-responsibility/
Summit Pharmaceuticals International Corporation	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. (Among the directors, executive officers and general managers, understanding the background and objective of the Modern Slavery Act, and noticing it and confirming in compliance with the SC Group CSR Action Guidelines through reporting lines.) https://www.summitpharma.co.jp/english/index.html
Tecnologia Para la Construccion Y Minería S.L.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. No company website