

Sumitomo Corporation of Americas

Combined Report on Forced and Child Labour for FY 2024

Sumitomo Corporation of Americas (SCOA) is committed to preventing and reducing the risk of modern slavery (including forced labour, child labour and human trafficking) in its business and supply chains. This report provides an overview of the steps SCOA took in fiscal year 2024 (from April 1, 2024 to March 31, 2025) to prevent and reduce the risk of forced labour and child labour in its business and supply chains, in compliance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act of Canada* and the *Modern Slavery Act of 2015 of the UK*. This statement was approved by the board of directors of SCOA on May 14th, 2025.

Background and organisational structure

SCOA was established in 1952 as a corporation. It is headquartered in New York City, with 460 employees in US and eight offices in major U.S. cities. SCOA is the largest subsidiary of Sumitomo Corporation (SC), one of the world's leading traders of goods and services. We pursue productive trade, marketing and investment partnership opportunities with businesses around the world.

We are guided by our founder Masatomo Sumitomo's precepts to create new value and realize prosperity by engaging in sound business practices and building relationships of trust among our customers, suppliers and partners. Over the past six decades, these relationships have strengthened, and our business partners have come to expect reliable business knowledge, corporate resourcefulness and quality services. SCOA's core businesses divisions include energy, automotive, social infrastructure, agri-food and life science, construction and transportation, real estate, mineral resources and energy innovation.

As an integrated trading company, SCOA provides a variety of solutions depending on the unique needs of our customers. On the supply side, we leverage our global reach to locate and source high-quality, price competitive materials and manage the timely integration of these products. As a trading partner, we can help our customers gain access to new markets, navigate local regulatory requirements and provide administrative resources as needed. The foundation of our centuries-long history across various industries makes SCOA an ideal partner to companies who value trust, integrity and experience.

For more information on SCOA's business, activities and supply chains, please visit the following link:

[Sumitomo Corporation of Americas](#)

Steps taken to ensure that modern slavery including forced labour, child labour and human trafficking are not taking place in the company's business and supply chains

SCOA, as a member of the Sumitomo Corporation (SC) Group, shares [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 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. SCOA adopts [Sumitomo Corporation Group Compliance Policy](#). This policy highlights that compliance is a top priority for group companies, mandating that business operations adhere to laws and regulations. It requires us to respect the human rights of all individuals, including the rights of those with whom we have a relationship or contact.

Furthermore, to achieve sustainable growth through resolving social issues, we have set "Respect human rights" as one of the "[Material Issues](#)" which refers to important social issues that SC Group must address and its advanced medium- to long-term commitments toward resolving them. We will continue to promote these efforts and disclose our progress.

SCOA takes its commitment to tackling modern slavery including forced labour, child labour and human trafficking very seriously. The followings are the steps which we have taken to help ensure that modern slavery including forced labour, child labour and human trafficking are not taking place in our business or supply chains:

SC Group's Human Rights Policy

SCOA is committed to compliance with global labour and human rights standards and law. SCOA respects [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 addition, we are participants in the [UN Global Compact](#) and declared our support for the 10 principles in March 2009. This international sustainability related initiative shares the same values as our Corporate Mission Statement.

SCOA has a policy against all forms of human trafficking and related activities, which is set forth in detail in the SCOA employee handbook. In line with [SC Group's Human Rights Policy](#), we are working towards identifying and preventing or mitigating any adverse impact on human rights. Where we identify that our group's practices have

caused or contributed to an adverse impact on human rights, we will endeavour to take appropriate remedial measures, and we will seek to improve and progress human rights measures through engagement and dialogue with relevant stakeholders.

The SC Group CSR Action Guidelines for Supply Chain Management

SCOA strives to implement [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. No violations of these guidelines relating to child and/or forced labour were identified in 2024.

Human Rights Due Diligence

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

SC’s 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, through desktop survey, interviews of experts on business and human rights and internal interviews, SC identified eight salient human rights issues that should be addressed with priority so that we can assess impacts concerning human rights throughout SC Group.

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.

To further hone SCOA’s key areas of focus building upon the foundational work that SC began, SCOA completed a deeper human rights assessment in partnership with expert consultants in business and human rights. The project included a salience scan to identify which industries carry a risk of forced labour or child labour being used in the operation or supply chain. Further information on the current status of the due diligence process is discussed below in “Assessing Effectiveness.”

Risks and steps taken to reduce risks of forced and child labour.

The salience scan conducted in 2024 was a high-level evaluation of the industries in which SCOA operates. According to the salience scan, there is a salient risk of forced and/or child labour within the supply chains of all industries in which SCOA operates. Salience risks of forced labour were indicated by the assessment in agriculture and food, automotive, chemical, energy, industrial equipment, logistics, media & digital, mineral resources, real estate, and metal industries. Salient risks of child labour were noted in agriculture and food, automotive, chemical, energy, logistics, mineral resources, and steel and metal industries.

In fiscal year 2024, we did not identify any cases of forced or child labour in our supply chains. As a result of that, we have not faced a situation to remediate forced labour or child labour and to remediate loss of income for vulnerable families.

Group Governance

As a member of the SC Group, SCOA is operating an optimal management system to control risks appropriately and increase the odds of achieving its business strategies for management. Specifically, we have introduced a governance framework that uses SC Group standard tool called Basic Elements to visualize the internal control status 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 our business or supply chains through further enhancing governance considering its business nature and regional conditions.

Reporting Mechanism

There are several ways SCOA employees may report violations of the Human Rights Policy, including to their immediate manager, Human Resources, or to a member of the SCOA Legal & Compliance Group. Alternatively, an employee or third-party may report the matter anonymously or ask questions regarding the same to SCOA’s Ethics Helpline at www.scamericas.ethicspoint.com or by calling 1-888-279-1912. Note that employees may report suspected ethical and other compliance violations without any fear of retaliation. We also have an internal incident management system to ensure that human rights issues are communicated to the SCOA management team for proper review and remediation.

Training

In fiscal year 2024, SCOA rolled out a new 15-minute e-learning module on business and human rights in English and Japanese. Developed by SC Sustainability

Department, this mandatory e-learning provided overall information of international initiatives and regulations on business and human rights, an overview of the issues of forced and child labor, as well as SC Group's own policies and procedures. SCOA deployed the training entity wide in May 2024 to all SCOA employees and executives. 422 SCOA employees have taken the training. This training was also rolled-out to all group companies for integration in their own learning management systems.

In early 2024, all SCOA employees, leaders, and SC Americas Group Company representatives were invited to participate in an interactive voluntary human rights workshop with our external consultants. The workshop lasted for 1.5 hours and covered the background of business and human rights, training on human rights due diligence and further training on SCOA human rights initiatives. Our SCOA employee session had 226 participants, SCOA leadership session had 23, and our group company training session had 79 participants.

Assessing Effectiveness

In fiscal year 2024, SCOA assessed our human rights program in partnership with our expert consultants. Consultants completed a gap analysis of SCOA's human rights management system compared to the UN Guiding Principles on Business and Human Rights and a salience scan to identify high-level salience issues across trading and investments. This yearlong assessment closed with the development of a human rights roadmap, which provides SCOA with ways to improve the management of human rights in years to come.

There were zero reports of issues relating to forced or child labour through the Ethicspoint hotline in 2024.

SCOA believes that eradication of modern slavery is important, and 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.

May 20, 2025



Signed by:

Kotaro Tameda
CEO & President
Representative Director
Sumitomo Corporation of Americas