

## **Sumitomo Corporation of Americas**

### **Combined Report on Forced and Child Labour for FY 2025**

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 2025 (from April 1, 2025 to March 31, 2026) 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 15, 2026.

#### **Background and organisational structure**

SCOA was established in 1952 as a corporation. It is headquartered in New York City, with 460 employees in the U.S. and nine 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 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. For over 70 years, 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 and investment 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.

In FY 2025, SCOA's global supply chain included products sourced from Australia, Brazil, Canada, Switzerland, China, Germany, India, Italy, Japan, South Korea, Netherlands, Singapore, Taiwan, and the United States of America. Traded goods include products in our core businesses described above.

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 report outlines the steps which we have taken to help ensure that modern slavery including forced labour, child labour and human trafficking is 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 as reflected in our [SC Group's Human Rights Policy](#). 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](#), declaring 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 2025.

### **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](#). Beginning in fiscal 2020, through desktop survey, interviews of experts on business and human rights and internal interviews, SC identified the salient human rights issues that should be addressed with priority across the SC Group. From FY2021 to FY2024, SC conducted human rights due diligence across all businesses with the support of outside experts, identifying and assessing human rights risks.

The identified ten 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, Personal information and privacy, health and safety of customers, and upstream supply chain issues.

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 in fiscal year 2024. 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 2025, the SCOA Sustainability Department with the support of outside counsel performed a vendor-focused supply chain risk assessment for forced and child labour risks in our trading business supply chain. The methodology developed by outside counsel included evaluating risks by location, industry, compliance history, publicly available reporting, and leveraged the data of several risk platforms. High risks of forced labour were identified in our life science, meat, aerospace and defence, chemical, mineral resources, automotive, and steel supply chains. High risks were identified for products sourced from Mexico, Brazil, China, and USA. We are working to develop risk mitigation plans to address these risks in FY 2026.

The risk assessment methodology did not enable us to make conclusions regarding the presence of forced labour indicators in our supply chain. Additionally, in fiscal year 2025, there were no allegations of forced or child labour received through our grievance mechanism. Accordingly, SCOA did not identify forced labour or child labour requiring remediation in FY2025.

### **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. 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](http://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 FY 2025, we conducted three business and human rights training workshops for the Detroit, Houston, and Mexico City SC Group Offices. This workshop was developed by human rights experts on the SCOA sustainability team. In this optional, interactive 1-hour training session, 82 attendees across the three offices joined in-person and remotely to learn about human rights specific to their business units, including forced and child labour, and expectations for businesses according to the UN Guiding Principles on Business and Human Rights. We plan to continue to conduct this workshop across different locations and business units.

We also rolled out a new 20-minute E-learning on forced and child labour in FY 2025. This training was developed by a sustainability consultancy and content was customized to be applicable to SCOA's business model and industries. This training provides an overview of forced labour and child labour risks, the relevant regulatory landscape around the world, and Sumitomo Corporation Group policies addressing these issues. This training is mandatory to be taken by all employees at SCOA and across SC offices in the Americas. After deploying, this E-learning will become an annual requirement.

## **Assessing Effectiveness**

In fiscal year 2025, we assessed our supply chain management practices with expert sustainability consultants. Consultants completed a gap analysis of SCOA's supply chain management system against global standards. The assessment concluded with recommendations for improving supply chain due diligence which we have turned into a roadmap for improving our practices in the years to come.

We also conducted an assessment to evaluate the effectiveness of our grievance mechanism against the effectiveness criteria of the UN Guiding Principles on Business and Human Rights. With the results, we are creating an improvement plan to further align our grievance mechanism to the UNGPs. There were zero reports of issues relating to forced or child labour through the Ethicspoint hotline in 2025.

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 15, 2026

*Attestation*

In accordance with the requirements of the Acts, and in particular section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, I attest that I have reviewed the information contained in the report for the entity (or entities listed above). Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Acts, for the reporting year listed above. I have the authority to bind Sumitomo Corporation of the Americas.

Signed by:



Kotaro Tameda  
CEO & President  
Representative Director  
Sumitomo Corporation of Americas