



Sumitomo Corporation of Americas

Statement Against Modern Slavery and Human Trafficking for Fiscal Year 2021

Sumitomo Corporation of Americas (SCOA) is committed to improving its practices to combat modern slavery and human trafficking. This statement constitutes SCOA's statement against modern slavery and human trafficking for fiscal year 2021 ending March 31, 2022. This statement was approved by the board of directors of Sumitomo Corporation of Americas on September 16, 2022.

The organization's structure, its business and its supply chains

Sumitomo Corporation of Americas was established in 1952. It is headquartered in New York City, with eight offices in major U.S. cities. Sumitomo Corporation of Americas is the largest subsidiary of Sumitomo Corporation, one of the world's leading traders of goods and services. We have full access to Sumitomo Corporation's immense global network of business enterprises in more than 65 countries. We pursue productive trade, marketing and investment partnership opportunities with businesses throughout the region.

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. Our core businesses include Tubular Products, Steel & Non-Ferrous Metal, Automobile, Construction & Transportation Systems, Infrastructure, Chemicals and Electronics, Media and Digital Business, Materials, Supplies and Real Estate, Food & Lifestyle, Mineral Resources and Energy.

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

<https://www.sumitomocorpofamericas.com/>

www.sumitomocorp.com/en/us/scoa

Steps taken to ensure that modern slavery and human trafficking are not taking place in Sumitomo Corporation of Americas' business and supply chains

As a member of the Sumitomo Corporation Group (SC Group), Sumitomo Corporation of Americas, shares [Sumitomo's Business Philosophy](#), which has been passed down and followed faithfully for more than 400 years since Masatomo Sumitomo (1585-1652) founded the company. [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. The company's Corporate Mission Statement clearly states that SC Group respects the personality of each individual and places prime importance on integrity and sound management.

The company takes its commitment to tackling modern slavery and human trafficking very seriously. We set out below the steps we have taken to help ensure that modern slavery and human trafficking are not taking place in our business or supply chains:

SCOA's Anti-Human Trafficking Policy

SCOA has a zero-tolerance policy against all forms of human trafficking and related activities, which is set forth in detail in the SCOA employee handbook. As a member of the SC Group, SCOA also operates in line with [the SC Group's Human Rights Policy](#) to i) strive to identify and to prevent or mitigate any adverse impact on human rights through the implementation of human rights due diligence processes, ii) identify any ways in which our group's practices have caused or contributed to an adverse impact on human rights, and to take any appropriate remedial measures, iii) improve and progress human rights measures through engagement and dialogue with relevant stakeholders, and so on.

There are several ways SCOA employees may report violations of the Anti-Human Trafficking 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.

SCOA also respects "[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.](#)"

SCOA's Initiative Against Modern Slavery

SCOA follows new developments in the law, including the [Uyghur Forced Labor Prevention Act](#) (UFLPA) that was signed into law on December 23, 2021. The law prohibits imports into the United States of products made by forced labor made in the Xinjiang Uyghur Autonomous Region (XUAR) in China.

In response, the company endeavors to have a robust anti-forced labor compliance program. As part of the due diligence process, the company prepared a UFLPA questionnaire for relevant suppliers. Among other things, the questionnaire requests information on whether the supplier sources raw materials from China and XUAR and whether the supplier's Code of Conduct requires compliance with forced labor prohibitions.

The company also updated contract provisions in its Terms and Conditions to include representations that the manufactured goods sold to the company will be produced and delivered in full compliance with applicable laws and regulations, including those relating to forced and child labor. SCOA Legal also provides training for the business units to learn more about this developing area of law, as well as other related areas of interest, including U.S. export compliance, anti-corruption, and code of business conduct.

[CSR Action Guidelines for Supply Chain Management](#)

SCOA acts in accordance with [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 supply chain management. The business units aim to incorporate human rights into their annual targets and objectives with the goal that new contracts awarded promote and ensure respect for human rights in line with SCOA's Anti-Trafficking Policy and the UN Global Compact's 10 principles. As part of the Health, Safety, Security and Environment Questionnaire, SCOA requests suppliers and business partners confirm their compliance with the following principles: "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 or not to continue our business with them.

[Enhancement of SC Group Governance](#)

As a member of the SC Group, SCOA is collaborating with Sumitomo Corporation on "Enhancement of SC Group Governance" to improve business quality and corporate value through internal control. Specifically, we have introduced a governance framework that uses SC Group's 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 our business or supply chains through further enhancing governance considering its business nature and regional conditions.

Sumitomo Corporation of Americas 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.

September 16, 2022

Tomonori Wada

Signed by:

Tomonori Wada
President & CEO,
Representative Director,
Sumitomo Corporation of Americas