

[Sumitomo Corporation (Shanghai) Ltd]

Modern Slavery Act Transparency Statement for FY 2024

[Sumitomo Corporation (Shanghai) Ltd] (SCSH) is committed to improving its practices to prevent modern slavery including forced labour, child labour and human trafficking. This statement addresses the fiscal year 2024 (from January 1st, 2024 to December 31st, 2024), in compliance with the requirements of [Modern Slavery Act 2015 of the UK](#). This statement was approved by the board of directors of the company on June 30th, 2025.

Background and organisational structure

SCSH, as an investment company of Sumitomo Corporation (SC) in China, is engaged in multifaceted business activities, including import and export of goods and business investment, based on partnerships with customers in various business fields, including metal products, transportation & construction systems, environment & infrastructure, living related & real estate, mineral resources & energy, chemicals & electronics and media & digital.

For more information on SCSH's business overview, please visit the following website: https://www.sumitomocorp.com/zhcn/easia/sccn/?region_selector=true

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

SCSH, 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.

Furthermore, to achieve sustainable growth through resolving social issues, we have set "Respect human rights" as one of "[Material Issues](#)" which are referred 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.

SCSH 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](#)

SCSH 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](#).

SCSH also acts, as a member of the SC Group, 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 endeavour 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.

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

SCSH 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 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.

[Group Governance](#)

As a member of the SC Group, the company 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 an internal control framework to resolve issues identified through internal "dialogue".

As a member of the SC Group, SCSH 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.

Training

The company 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.

June 30th, 2025

Signed by:

[Aritomo Haruhiko, Yamane Masahiro, Sano Goro]
Representative Director,
[Sumitomo Corporation (Shanghai) Ltd]