Summit Pharmaceuticals International Corporation

Modern Slavery Act Transparency Statement for FY 2023

Summit Pharmaceuticals International Corporation (SPI) is committed to improving its practices to prevent modern slavery including forced labour, child labour and human trafficking. This statement addresses the fiscal year 2023 (from April 1, 2023 to March 31, 2024), in compliance with the requirements of Modern Slavery Act 2015 of the UK. This statement was approved by the board of directors of SPI on June 26, 2024.

Background and organisational structure

We have 4 bases in Japan and 2 subsidiaries overseas. Our business are as follows.

- 1. Import, export and sale of pharmaceuticals, quasi-drugs, medical devices, food additives, as well as their raw materials, bulk, final products.
- 2. Import and sale of cells of animal and plant, microorganism and human tissue samples as drug discovery tools and research instruments, and arrangement of research collaboration.
- 3. Consultancy of drug development and support of new drug licensing.

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

https://www.summitpharma.co.jp/english/

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

SPI, as a member of the Sumitomo Corporation (SC) Group, shares <u>Sumitomo's Business Philosophy</u>, which has been passed down and followed faithfully for more than 400 years since Masatomo Sumitomo (1585-1652) had founded. <u>SC Group's Corporate Mission Statement (Management Principles and Activity Guidelines)</u> 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.

SPI 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

SPI 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.

SPI also acts, as a member of the SC Group, in line with <u>SC Group's Human Rights Policy</u>, 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

SPI 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, SPI 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

In order to raise our awareness especially about modern slavery, SPI utilizes an American NGO Verite's free e-Learning of Supply Chain Accountability on forced labor 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.

SPI 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 26, 2024

Signed by:

Katsuya Okuyama President & CEO Summit Pharmaceuticals International Corporation