

## Sumitomo Corporation Group

### Slavery and Human Trafficking Statement for the Fiscal Year 2019

Sumitomo Corporation (SC) Group is committed to improving its practices to combat modern slavery and human trafficking. This statement has been published in accordance with [the UK Modern Slavery Act 2015](#) and constitutes SC Group's modern slavery and human trafficking statement for the fiscal year 2019 ended March 31, 2020. The statement has been approved by the board of directors of SC as the parent company of SC Group every year. This statement was approved by the board of directors of SC on August 21, 2020.

#### Background and organisational structure

SC Group is an integrated corporate group committed to business activities in a wide range of industries with around 130 offices and subsidiaries in over 60 countries and a network of over 900 group companies worldwide. With its global network and based on trust from companies in various industries and from consumers, SC Group engages in multifaceted business activities by making the most of its Integrated Corporate Strength. These business activities include sales of a variety of products and services within Japan, import and export, trilateral trade, and domestic and international business investments. SC Group employs over 70,000 people.

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

<https://www.sumitomocorp.com/en/jp/about>

#### Steps taken to ensure that modern slavery and human trafficking are not taking place in SC Group's business and supply chains

At the core of SC Group lies [Sumitomo's Business Philosophy](#), which has been passed down and followed faithfully for more than 400 years since Masatomo Sumitomo (1585-1652) had founded. [Our 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.

We also identified our [“Six Material Issues to Achieve Sustainable Growth with Society”](#) in 2017, a set of social issues that SC Group regards as important and should prioritize addressing through its business activities as well as the challenges SC Group needs to overcome in creating solutions. SC Group positions these material issues as an important factor in developing business strategies and in the decision-making process for individual businesses.

SC Group takes its commitment to tackling modern slavery and human trafficking very seriously. We set out below the steps SC Group has taken to help ensure that modern

slavery and human trafficking are not taking place in SC Group's business or supply chains:

#### *SC Group's Human Rights Policy*

We respect [“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”](#).

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 endeavor 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.

#### *SC Group’s CSR Action Guidelines for Supply Chain Management*

We have established [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 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 to continue our business with them or not.

#### *Enhancement of SC Group Governance*

In order to embody “Reinforcement of Management Bases” in [the Medium-Term Management Plan 2020](#), we are working on “Enhancement of SC Group Governance” aiming to improve business quality and corporate value through internal control for all consolidated subsidiaries. Specifically, we have introduced a governance framework that uses SC Group 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 SC Group’s business or supply chains through further enhancing governance considering its business nature and regional conditions.

### *Social and Environmental Risk Management in Individual Project*

In order to promote social and environmental risk management for each business, taking into account the nature of the business and the characteristics of the region where it operates, we established a management system that considers social and environmental impacts when making decision on a new investment, by utilizing an assessment sheet for social and environmental risks, and by having the Corporate Sustainability Department, a specialized organization for social and environmental issues, participate in the process of deliberations.

After the implementation of each investment, we monitor the status of social and environmental risk management and if any issues arise, we will work for improvements according to the characteristics of the business.

### *Active commitment to the UN Global Compact*

We signed [the UN Global Compact](#) and declared its support for the 10 principles in March 2009 as the parent company of SC Group. This international sustainability related initiative shares the same values as our Corporate Mission Statement. With our participation in the Global Compact, we have committed ourselves to further increasing corporate value by constantly seeking out areas of our business activities that can be improved in light of the values advocated by the 10 principles. The UN Global Compact has been referred also through the internal auditing process of SC Group.

### *Training*

In order to raise our awareness especially about modern slavery, we have utilized an American NGO Verite's free e-Learning of Supply Chain Accountability on forced labor and human trafficking 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](#).

Since SC Group conducts a wide range of business in multiple sectors, the associated risks vary, however the eradication of any instances of modern slavery and human trafficking remains a key priority.

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 29, 2020

Signed.

Hideki Yamano	Kenichi Nakamura
Representative Director,	President & CEO
Senior Managing Executive Officer,	Summit Pharmaceuticals International
Chief Strategy Officer and Chief Information Officer	Corporation
Sumitomo Corporation	

This statement covers the following consolidated subsidiaries, and please refer to the appendix for each company's initiatives;

- Bristol Fruit Sales (Bananas) Ltd.
- Edgen Group Inc.
- Edgen Murray Europe Ltd.
- Emerald Grain Pty Ltd.
- Eryngium Ltd.
- Fyffes Bananas (Swords) Ltd.
- Fyffes BV
- Fyffes Group Ltd.
- Howco Group Plc
- Kienle + Spiess GmbH
- Moto-Pfohe Eood
- SC Foods Co., Ltd.
- Sumi Agro Europe Ltd.
- Sumi Agro Ltd.
- Sumisho Aero-Systems Corporation
- Sumitomo Corporation Power & Mobility Co., Ltd.
- Sumitomo Corporation Asia & Oceania Pte. Ltd.
- Sumitomo Corporation Europe Ltd.
- Sumitomo Corporation Middle East FZE
- Sumitomo Corporation of Americas- Sumitomo Corporation Saudi Arabia Ltd.
- Sumitomo Corporation (Shanghai) Ltd.
- Sumitomo Deutschland GmbH
- Sumitomo Shoji Chemicals Co., Ltd.
- Summit Agro International Ltd.
- Summit Exploration and Production Ltd.
- Summit Motors Ljubljana, Export-Import-Distribucija, D.O.O.
- Summit Motors Slovakia, Spol.S.R.O.
- Summit Pharmaceuticals Europe Ltd.
- Summit Pharmaceuticals International Corporation
- Tecnologia Para la Construccion Y Minería S.L.

Appendix. Initiatives of each Sumitomo Corporation Group company in response to UK Modern Slavery Act

Sumitomo Corporation	<p>In addition to the initiatives that covers Sumitomo Corporation (SC) Group described in the SC Group Statement, SC is addressing following individual initiatives:</p> <ol style="list-style-type: none"> <li>1) Active participation as a board member company of the Global Compact Network Japan, a local network of the United Nations Global Compact</li> <li>2) In fiscal 2019, SC conducted training for 209 new employees, 39 new team leaders, 27 new general managers, and 304 locally hired abroad SC Group employees on sustainability promotion, including respect for human rights. And also, we created our own e-Learning related to business and human rights, and as of May 21st, 2020, a total of 5,234 people, including group employees mainly with SC executives and employees, completed the training. <a href="https://www.sumitomocorp.com/en/jp/sustainability/csr#03">https://www.sumitomocorp.com/en/jp/sustainability/csr#03</a></li> </ol>
Bristol Fruit Sales (Bananas) Ltd. Fyffes Bananas (Swords) Ltd. Fyffes BV Fyffes Group Ltd	<p>As a group of Fyffes Ltd., while acknowledging the SC Group's statement and complying with the California Supply Chain Transparency Act, the company's statement approved by the company's board of directors has been posted on the company's website. <a href="https://www.fyffes.com/caring-and-sharing/modern-day-slavery">https://www.fyffes.com/caring-and-sharing/modern-day-slavery</a></p> <ol style="list-style-type: none"> <li>1) All of Fyffes compliance team have been trained in SMETA and apply its methodology in their regular internal audits. Conducting SMETA type audits in the supply chain. The majority of its suppliers (246 sites) are SEDEX members. All of Fyffes ripening facilities were subject to unannounced SMETA audits during the year.</li> <li>2) Fyffes Group Ltd continues to audit its labour providers using a standard developed in 2016, looking at how the labour provider recruits and treats the workers.</li> <li>3) In 2020, Fyffes suspended one supplier with poor results to encourage them to improve their compliance. Once the supplier had reached a satisfactory level of compliance, we recommenced buying from this supplier.</li> <li>4) In 2019, Fyffes rolled-out 'Fyffes Responsible Business Conduct Principles', including the requirement to be vigilant regarding coercive labour, human trafficking and child labour and to immediately report any suspicions of such activity. In addition, Fyffes made available to both internal and external stakeholders, a grievance mechanism 'the Fyffes Ethics Hotline', an independent, confidential online and telephone hotline for reporting unethical behaviour by a Fyffes employee. <a href="https://www.fyffes.com/who-we-are/our-principles">https://www.fyffes.com/who-we-are/our-principles</a> <a href="https://secure.ethicspoint.com/domain/media/en/gui/56812/index.html">https://secure.ethicspoint.com/domain/media/en/gui/56812/index.html</a></li> <li>5) Fyffes is the largest supplier of certified Fairtrade bananas in Europe and we have a significant number of Fairtrade melons distributed in the United-States. All the pineapples sold by Fyffes are certified by Rainforest Alliance, while for bananas, in 2019 this represented approximately 25%.</li> <li>6) Rolling-out a 'Global Human Rights Policy and Statement' and bringing it to life through training and internal protocols. <a href="https://www.fyffes.com/resource-centre/download/Global_Human_Rights_Policy.pdf">https://www.fyffes.com/resource-centre/download/Global_Human_Rights_Policy.pdf</a></li> <li>7) In 2019, they conducted their first corporate-wide human rights impact assessment (HRIA) including a review of modern slavery risks across their supply chain, in line with the UN Guiding Principles on Business and Human Rights, through the global non-profit organisation BSR. Fyffes chose five countries to do an in-depth analysis – Belize, Colombia, Costa Rica, the Dominican Republic and Honduras. As the result, two risk areas relevant to Modern Slavery were identified; 'child labour' and 'migrant workers labour violations and forced labour' and a third indirectly related area; 'access to a grievance mechanism'. Regarding 'child labour', developing a Child Labour Remediation Protocol during 2020 and ensuring this adopted by key personnel to take swift action in the event of the discovery of a child in the workplace. Regarding 'migrant workers labour violations and forced labour', vulnerable Haitian migrants in the Dominican Republic, it need to be ensured that these workers understand their rights, including basic benefits, in their own language. Regarding 'access to a grievance mechanism', to run a broader campaign internally to make sure all employees are fully aware of that mechanism, including training.</li> </ol>
Edgen Group Inc.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. No company website
Edgen Murray Europe Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. <a href="https://www.edgenmurray.com/userfiles/ModernSlaveryStatement.pdf">https://www.edgenmurray.com/userfiles/ModernSlaveryStatement.pdf</a>
Emerald Grain Pty Ltd.	While acknowledging the SC Group's statement, the Company is a "reporting entity" under the Australian Modern Slavery Act 2018 (Cth) and will prepare a statement in compliance with that regime. In summary, in its first reporting year under the Australian regime, the Company established a Modern Slavery Committee to review its operations and supply chains and undertook risk assessments. Further due diligence activities were undertaken in respect of high risk supplier groups identified. Other initiatives included raising awareness of modern slavery risks within the organization including the Board, review and amendment of key vendor contracts to include a modern slavery clause. <a href="https://emeraldgrain.com/home/sitemap/privacy-policy/">https://emeraldgrain.com/home/sitemap/privacy-policy/</a>
Eryngium Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. No company website
Howco Group Plc	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. <a href="https://www.howcogroup.com/">https://www.howcogroup.com/</a>
Kienle + Spiess GmbH	Signing by three Managing Directors to the SC Group statement, and its importance and purpose were recognized by its senior management. Link to SC group statement in Downloads area on the company's website. <a href="https://www.kienle-spiess.de/kienle-spiess-home-en.html">https://www.kienle-spiess.de/kienle-spiess-home-en.html</a>
Moto-Pfohe Eood	Signing by two Managing Directors to the SC Group statement, and its importance and purpose were recognized by its senior management. <a href="https://www.motopfohe.bg/en/about-us/our-slavery-and-human-trafficking-statement">https://www.motopfohe.bg/en/about-us/our-slavery-and-human-trafficking-statement</a>
SC Foods Co., Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. <a href="http://www.sfoods.co.jp/english/aboutus/outline.html">http://www.sfoods.co.jp/english/aboutus/outline.html</a> <ol style="list-style-type: none"> <li>1) Added "Human rights, occupational safety and environmental protection" to the survey items in the "Quality Control Status Preliminary Survey Table" for inspection materials at supplier factories, etc. (ex. Confirmation of age by public documents and contents of employment contract)</li> <li>2) Applying 1) to new suppliers, and existing supplier is checked at the time of regular factory survey</li> </ol>

Sumi Agro Europe Ltd. Sumi Agro Ltd.	While acknowledging the SC Group's statement, the company's statement approved by the company's board of directors has been posted on the company's website. <a href="http://www.sumiagro.com/">http://www.sumiagro.com/</a> 1) Adopting the SC Group CSR Action Guidelines as an official "SAE Group Rule" to reinforce the awareness to the CSR Action Guideline among the SAE Group employees and executives. 2) Requesting all suppliers to acknowledge and confirm that the products supplied to the SAE Group are produced in compliance with the CSR Action Guidelines. 3) Holding training sessions with employees regarding the principles to be followed to mitigate the risks of slavery and human trafficking in supply chains and the business. 4) Encouraging employees to identify and report potential violations of the CSR Action Guidelines and to report suspicious activities relating to slavery and human trafficking. 5) All employees and executives of SAE took the Verite's Free E-Learning courses
Sumisho Aero-Systems Corporation	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. <a href="https://www.sc-aero.co.jp/company/principles.html">https://www.sc-aero.co.jp/company/principles.html</a>
Sumitomo Corporation Power & Mobility Co., Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. <a href="https://www.sc-pmco.com/en/company/csr/">https://www.sc-pmco.com/en/company/csr/</a>
Sumitomo Corporation Asia & Oceania Pte. Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. <a href="https://www.sumitomocorp.com/en/asia-oceania/sustainability/csr#03">https://www.sumitomocorp.com/en/asia-oceania/sustainability/csr#03</a>
Sumitomo Corporation Europe Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. <a href="https://www.sumitomocorp.com/en/europe/sceu/csr#02">https://www.sumitomocorp.com/en/europe/sceu/csr#02</a>
Sumitomo Corporation Middle East FZE	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. <a href="https://www.sumitomocorp.com/en/mideast/sustainability/csr#03">https://www.sumitomocorp.com/en/mideast/sustainability/csr#03</a>
Sumitomo Corporation of Americas	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. <a href="https://www.sumitomocorp.com/en/us/sustainability/csr#03">https://www.sumitomocorp.com/en/us/sustainability/csr#03</a> SCOA's zero-tolerance policy "Human Trafficking Policy" against all forms of human trafficking and related activities.
Sumitomo Corporation Saudi Arabia Ltd.	Signing by the Managing Directors to the SC Group statement, and its importance and purpose were recognized by its senior management. <a href="https://www.sumitomocorp.com/en/mideast/sustainability/csr#03">https://www.sumitomocorp.com/en/mideast/sustainability/csr#03</a>
Sumitomo Corporation (Shanghai) Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. <a href="https://www.sumitomocorp.com/en/easia/sustainability/csr#03">https://www.sumitomocorp.com/en/easia/sustainability/csr#03</a>
Sumitomo Deutschland GmbH	Signing by the Managing Directors to the SC Group statement, and its importance and purpose were recognized by its senior management. <a href="https://www.sumitomocorp.com/en/europe/sceu/csr#02">https://www.sumitomocorp.com/en/europe/sceu/csr#02</a>
Sumitomo Shoji Chemicals Co., Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. <a href="https://www.sc-chem.co.jp/en/sustainability/csr/">https://www.sc-chem.co.jp/en/sustainability/csr/</a>
Summit Agro International Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. <a href="http://www.summit-agro.co.jp/english/company/contribution.html">http://www.summit-agro.co.jp/english/company/contribution.html</a>
Summit Exploration and Production Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. <a href="https://summiteandp.com/modern-slavery-statement/">https://summiteandp.com/modern-slavery-statement/</a> SEPL is currently putting into place policies designed to ensure that: 1) Its supply chain reflects SEPL's values and respect for the importance of the protection and advancement of human rights; 2) There are due diligence processes in relation to slavery and human trafficking in its business and supply chain; 3) Identification of the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk; 4) The polices are effective in ensuring that slavery and human trafficking is not taking place in its business or supply chains; 5) There is adequate training about slavery and human trafficking available to its employees
Summit Motors Ljubljana, Export-Import-Distribucija, D.O.O.	Signing by the General Director to the SC Group statement, and its importance and purpose were recognized by its senior management. <a href="https://www.summitavto.si/en/about/social-responsibility">https://www.summitavto.si/en/about/social-responsibility</a>
Summit Motors Slovakia, Spol.S.R.O.	Signing by two Managing Directors to the SC Group statement, and its importance and purpose were recognized by its senior management. <a href="https://fordstore.sk/uploads/pdf/1600677400938pdf.pdf">https://fordstore.sk/uploads/pdf/1600677400938pdf.pdf</a>
Summit Pharmaceuticals Europe Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. <a href="https://summitpharmaeurope.com/about-us/our-responsability/">https://summitpharmaeurope.com/about-us/our-responsability/</a>
Summit Pharmaceuticals International Corporation	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. <a href="https://www.summitpharma.co.jp/english/index.html">https://www.summitpharma.co.jp/english/index.html</a> (Among the directors, executive officers and general managers, understanding the background and objective of the Modern Slavery Act, and noticing it and confirming in compliance with the SC Group CSR Action Guidelines through reporting lines.)
Tecnologia Para la Construcción Y Minería S.L.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. No company website