Respect for Human Rights

Basic Stance

Sumitomo Chemical regards respect for human rights as part of the foundation for business continuation. We are continuing to make a Group-wide effort to address this as a material issue to be addressed as management priorities, and provide disclosures on our measures and progress. In order to accelerate its efforts on human rights, Sumitomo Chemical formulated the Sumitomo Chemical Group Human Rights Policy in April 2019, based on the Universal Declaration of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Ten Principles of the United Nations Global Compact, and the United Nations Guiding Principles on Business and Human Rights. At the same time, we established the Human Rights Promotion Committee, a committee tasked with promoting our human rights initiatives. In order to pursue a Group-wide effort to respect human rights, we are committed to ensuring that all Group companies in Japan and overseas are fully aware of the Human Rights Policy and take action on these principles.

Sumitomo Chemical Group Human Rights Policy (Effective April 1, 2019)

This policy was formulated based on the advice of outside human rights experts with practical experience.

How to Make Use of Speak Up System

https://www.sumitomo-chem.co.jp/english/sustainability/ governance/compliance/forms/ 2 Sumitomo Chemical Group (Sumitomo Chemical Co., Ltd. and its Group Companies) has put in place this Human Rights Policy ("Policy") to demonstrate its commitment to international standards on human rights. All directors, executive officers and employees ("Personnel") of the Sumitomo Chemical Group will uphold this Policy.

1. Our Position on Human Rights

(1) Compliance with Standards, Laws and Regulations

We support and respect international standards on human rights, such as the Universal Declaration of Human Rights, International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and promote respect for human rights in line with the United Nations Guiding Principles on Business and Human Rights. Sumitomo Chemical Co., Ltd. is a signatory to the United Nations Global Compact and supports its Ten Principles, which include human rights and labor.

We comply with applicable laws and regulations in countries and regions where we operate, and where local laws and regulations conflict with international standards, we will seek ways to honor the principles of internationally recognized human rights.

(2) Respect for Human Rights in Our Business Activities

We do not discriminate against individuals based on employment status, age, sex, ethnic or social origin, ancestry, nationality, disability, religion, beliefs, marital status, or any other status. We do not tolerate any form of harassment, including sexual harassment or workplace bullying. We also respect fundamental labor rights including freedom of association and the right to collective bargaining, and prohibit forced labor or child labor.

We are committed to respecting human rights in our business activities and also strive to avoid contributing to infringement of human rights. In order to prevent and mitigate human rights risks related to our business activities, we will take necessary measures, including ensuring compliance with the Compliance Manual (the Sumitomo Chemical Code of Business Conduct) and other relevant policies and guidelines. We are also committed to understanding our impact on local communities and aim for harmonious coexistence with these communities.

We expect our business partners, including our suppliers, and other relevant stakeholders to act in line with the principles in this Policy, and we will seek ways to work with them to promote respect for human rights.

2. Our Approach to Human Rights Issues

(1) Providing Education and Raising Awareness

We will provide appropriate education and training to our Personnel so that this Policy is understood and effectively implemented.

(2) Human Rights Due Diligence

We will identify adverse human rights impacts, and seek to prevent or mitigate such impacts though our human rights due diligence framework.

(3) Responding to Identified Human Rights Impacts

We will engage with relevant stakeholders in order to address actual or potential adverse human rights impacts.

(4) Remedy

Where we identify that we have caused or contributed to adverse human rights impacts, we will endeavor to remediate such impacts through appropriate processes.

(5) Grievance Mechanisms

We have grievance mechanisms in place in the form of the Speak-Up System (whistle-blowing channels) in order to address concerns about activities that may adversely impact human rights or any other concerns raised about our business activities. These channels are available for anyone having involvement in Sumitomo Chemical Group's business activities, including their business partners as well as Sumitomo Chemical Group Personnel and their families. We will continuously seek to optimize our grievance mechanisms.

(6) Disclosure

We will report on our efforts to respect human rights including through our website, integrated report, Sustainability Data Book, and other relevant channels.

Note: From FY2024, the "Sustainability Data Book" has been renamed to "Sustainability Report."

Announcement of the Group Statement Based on Human Rights Laws and Regulations

We at the Sumitomo Chemical Group, as a globally operating corporation, have announced a Group statement on our efforts to address risks related to modern slavery and human trafficking in our business activities and supply chain. This statement is based on laws and regulations in various countries with regard to respect for human rights and the prevention of modern slavery and human trafficking, including the Modern Slavery Act of the United Kingdom, the Modern Slavery Act of Australia, the California Transparency in Supply Chains Act of the United States, and Fighting Against Forced Labour and Child Labour in Supply Chains Act of Canada.

Compliance with the Laws and Regulations involving Respect for Human Rights World-wide

https://www.sumitomo-chem.co.jp/english/sustainability/society/ human_rights/statement/

Management System

Human Rights Promotion Committee

Sumitomo Chemical has established the Human Rights Promotion Committee as its organization for promoting activities in compliance with the Human Rights Policy. In order to plan and implement measures to respect human rights across the entire value chain,^{*1} this committee consists of members from a broad range of related departments and functions. The senior executive officer in charge of corporate departments serves as chair, while from the business sectors, executive officers in charge of the Planning & Coordination Offices^{*2} of their respective departments participate as committee members.

- *1 Value chain is defined by ISO 26000, which is an international standard related to social responsibility, as an "entire sequence of activities or parties that provide or receive value in the form of products or services." See the explanation to the right for details.
- *2 The Planning & Coordination Offices are departments in charge of matters related to the planning, technologies, and development of each business sector.

Roles of the Committee

(1) Formulation and implementation of measures regarding respect for human rights across the Group's value chain, including:

- Formulation and publication of policies required by the Guiding Principles on Business and Human Rights and relevant national laws
- Identification of human rights issues across the value chain, assessment of risks, and implementation of measures, including
 remedies, that are appropriate for specific issues and their associated risks (human rights due diligence and relief efforts)

(2) Promotion of awareness of human rights inside and outside the Company



Human Rights Promotion Committee



Group-wide Approach

Based on its basic policy for respect for human rights, Sumitomo Chemical continues to take various measures to promote respect for human rights by working closely with its Group companies in Japan and overseas, while also engaging business partners.

Overseas, in particular, we are working with our regional headquarters in Europe, the Americas, China, and the Asia-Pacific region to ensure and promote compliance, including initiatives to protect human rights, based on our compliance system that we have established in accordance with respective local legal systems of the countries where we operate.

Examples of Initiatives

Human Rights Due Diligence and Relief Efforts

With the aim of promoting respect for human rights in its business activities, the Sumitomo Chemical Group has established a system for

Human Rights Due Diligence Overview of Initiatives



human rights due diligence in accordance with the United Nations Guiding Principles on Business and Human Rights. Under our approach to evaluating, reducing, and preventing human rights risks, not only for Sumitomo Chemical itself and its supply chain, but also for Group companies in Japan and overseas and their supply chains, we set priorities based on potential human rights risks, and implement our efforts in steps. The Sustainability Department, Legal Department, Procurement Department, and Logistics Department collectively serve as our secretariat office for human rights due diligence, working with business sectors and other relevant departments to ensure that our entire value chain is assessed.

External specialists conduct human rights risk evaluations of the Group to evaluate, reduce, and prevent human rights risks within the Group.

Moreover, for the supply chain, we rank priorities based on assumed human rights risks, conduct surveys, and promote engagement. As a comprehensive initiative, we ensure the effectiveness of human rights risk reduction initiatives by including clauses related to the implementation of human rights-related initiatives in new and existing agreements. As a practical risk reduction initiative, we distribute the Sumitomo Chemical Group Supplier Code of Conduct and collect responses to check sheets and human rights questionnaires, which independently confirm the status of initiatives by each supplier, thereby determining the status of general sustainability measures and management systems, including those related to human rights, at suppliers (supplier due diligence, hereinafter "supplier DD"). In addition, for suppliers of raw materials that have a high risk of having a negative impact on human rights (high-risk raw materials), we conduct high-risk raw material due diligence (DD) through surveys that track to the source.

If it is discovered through these activities that any negative impacts on human rights are occurring because of our Group's business activities, or have been fostered by the Group's business activities, we will redress or resolve those incidents through the appropriate procedures, in collaboration with related stakeholders.



Sumitomo Chemical Group Company Management

Sumitomo Chemical Group Company Management Flow

Group Company Risk Evaluation

Based on our risk approach policy, we are undertaking an overview of human rights due diligence over the past three years.



Risk Evaluation Items

For this risk assessment, we first set the four categories of society, environment, occupational safety and health, and governance as major focal areas, and for each category, we determined items in detail for assessing risks. For example, in the category of "society," we selected such diverse items as forced labor, child labor, discrimination, harassment, freedom of association, indigenous people, and cultural heritage. In other categories, we conducted risk assessment as to those items that we had addressed in audits, by examining them from a human rights perspective.

Society

Societ	y
S1	Forced labor and human trafficking
S2	Child labor
S3	Work hours
S4	Wages and employment contract
S5	Discrimination
S6	Harassment and punishments
S7	Freedom of association
S8	Land rights
S9	Negative social impact on local communities
S10	Indigenous people and cultural heritage
S11	Privacy
S12	Countermeasures and management procedures (supply chain)
Enviro	nment
E1	Environmental pollution
E2	Resource management
E3	Noises, vibrations, and odors
Occup	ational Safety and Health
HS1	Countermeasures and management procedures
HS2	Machine safety
HS3	Fires and explosions
HS4	Hazardous operations
HS5	Infectious, dusty, and asbestos operations
Gover	nance
G1	Prevention of bribery
G2	Prevention of accounting fraud
G3	Prevention of quality-related fraud
G4	Examples of violations

Policy for Calculating Risk Scores

Regarding each item, we confirm activities as factors either contributing to or reducing risk. When there are activities that could become risk factors, we add to the risk score, and when there are activities that reduce risk factors, we subtract from the risk score, thereby quantifying risk. The higher the risk score, the higher the human rights risk.

Examples that add to the risk score:

- Employing foreign national workers and migrant workers
- Operational region of the Group company ranked as a high-risk country in indices published by international institutions (for example: the Global Child Forum & UNICEF's Children's Rights and Business Atlas)
- Businesses considered labor-intensive (business categories considered to have a relatively high ratio of low-wage workers)

Examples that subtract from the risk score:

- Confirming the personal IDs of migrant workers and storing copies
- Formulating policies related to prohibiting child labor
- Confirming the provision of employee wages in an amount adequate to provide for a family and meet basic needs, such as food and housing

Points Updated for the Second Round of Human Rights Risk Assessments

We considered the following factors to ensure that changes in social conditions are appropriately reflected.

- Country-specific indicators newly formulated and released by international organizations
- Among raw materials being handled, the presence or absence of materials that are considered to have high human rights risks, such as conflict minerals
- Problematic rises in cases of human rights violations in the chemical industry and in countries where Group companies are based
- The addition of the safety and health field to the ILO's Core Labor Standards

• FY2023 Initiatives

We conducted written surveys and detailed surveys of 30 Group companies that were selected and prioritized based on the results of a human rights risk evaluation (risk mapping) conducted in fiscal 2022 encompassing the Company and consolidated management companies.

Written Survey (scope: a total of 26 companies in China, Singapore, Japan, and other countries)

With the written survey, we collect responses from questionnaires covering the categories of society, the environment, health and safety, and governance, asking subjects whether their businesses entail high human rights risks and the status of risk reduction measures.

Detailed Survey (scope a total of four companies in South Korea and Japan)

With the detailed survey, external experts confirm such documents as labor rules and wage regulations, conduct interviews with local employees, and confirm work environments for Group companies selected based on business operations and location. These surveys found no already existing significant negative effects on or violations of human rights in connection with the Group or affecting its business continuity, including violations of the human rights of indigenous peoples or local communities, or findings of highly probable significant negative effects or violations.

The detailed surveys identified the following situations.

- Initiatives conducted at each company with mechanisms aimed at reducing human rights risks
- To reduce child labor risks, two types of public documents are used to confirm the age of employee applicants, and documents are established to confirm internal documents.
- Unique internal reporting systems are established in addition to the Sumitomo Chemical Group's internal reporting system (the Speak-Up System), and surveys and responses are conducted for reports received internally and externally.
- There is a mechanism in place to confirm the status of suppliers' initiatives, such as regular local on-site surveys.

Issues that need improvement

• Regarding the Group's policies related to procurement and suppliers, leaks of communications to suppliers were confirmed.

• FY2024 Initiative Plans

In the fiscal 2023 surveys, we did not confirm the existence of any situation having a significant negative effect on human rights. However, we took measures to prevent and correct identified issues after surveying relationships and backgrounds and coordinated these measures with efforts to further reduce risks by sharing the insights gained with Group companies, including those not within the scope of the current surveys.

Human Rights Risk Assessments (First Round)

https://www.sumitomo-chem.co.jp/english/sustainability/files/docs/ humanrights_riskassessment_1.pdf

Supply Chain Management

Supply Chain Management Flow



A. Introducing Human Rights Clauses into Contracts

In fiscal 2020, we have formulated contract provisions that request understanding of and cooperation with our efforts to respect human rights, and have begun including them in our contracts with our business partners, including raw material suppliers, materials and equipments suppliers, logistics providers, and contract manufacturers.

We will not only continue to sign contracts that include these human rights provisions, we will also respond in line with the procedures defined in these human rights provisions when negative impacts on human rights occur in our supply chain, or under the apprehension that such an impact has occurred.

Main Content in Human Rights Clauses (required matters)

- Comply with human rights-related international standards and the Sumitomo Chemical Group Supplier Code of Conduct
- Strive to seek similar responses from suppliers further upstream
- Formulate policies and conduct human rights due diligence
- Cooperate on the Company's initiatives

B. Supplier DD

The Sumitomo Chemical Group is committed to building mutually beneficial and sound relationships with its business partners. We ourselves do business in a fair, equitable and transparent way, while also promoting sustainable procurement efforts across the entire supply chain with respect for human rights and a firm commitment to compliance. In order to encourage our business partners to work on sustainability efforts, in the Sumitomo Chemical Group Supplier Code of Conduct, we ask our business partners to respect human rights, prohibit complicity with human rights violations, prohibit discrimination and harassment, respect basic rights related to labor, prohibit forced labor and child labor, comply with the minimum wage, and assurance of a living wage. In addition, to accurately recognize the risk status related to legal compliance and ethics, society, occupational safety and health, and the environment in the procurement of raw materials in the supply chain, we send the Sumitomo Chemical Group Supplier Code of Conduct to our major business partners, collect the Sumitomo Chemical Group Sustainable Procurement Check Sheets filled out by each company, and confirm the status of initiatives.

Excerpts of the Human Rights Questionnaire

Furthermore, from fiscal 2021, we are conducting detailed investigations of the Company's major business partners using questionnaires specialized for human rights (the human rights questionnaire). The human rights questionnaire comprises two parts: one for the management system of the entire company and one with questions specialized for human rights (the presence or absence of human rights risks and the implementation status of risk reduction measures). We provide feedback on the results for all business partners who respond. And for those business partners that we would like to take further action, we engage with them on an individual basis (including exchange information related to sustainability initiatives and share the best practices of the Sumitomo Chemical Group, providing support as needed).

Procurement:

Promoting Sustainable Procurement throughout the Supply Chain 🖄

Major items	Examples of specific questions
(1) Questions related to company-wide management systems	Numbers of employees, presence of labor unions, status of formulation of policies (for example: human rights policies, legal and regulatory compliance, environmental conservation, occupational safety and health), supply chain management status (for example: status of risk assessments for business partners and the supply chain), establishment of whistleblower hotline
(2) Questions specially focused on human rights*	 We collect responses to the following questions to confirm the risk of forced labor of foreign national workers and migrant workers. Employment status of foreign national workers and migrant workers Does the company use recruitment specialists when employing foreign national workers and migrant workers? If using recruitment specialists, is the company doing its due diligence to ensure the specialists' business activities do not violate the human rights of job seekers? Has the company established an internal procedure for confirming whether recruitment specialists are collecting fees from job seekers? Before the planned worker departs their home country, does the company provide documents that clarify the main working conditions (job duties, wages, workhours, etc.) in the worker's native language or a language the worker can understand? Before the planned worker departs their home country, does the company explain necessary information related to the country where they will work or the workplace (rules of the workplace, occupational safety and health, performance considerations, use of dormitory, helpdesk contact information if there are problems, etc.) in the worker's native language or a language or a language the worker can understand?

Initiatives in FY2023

We send major suppliers the Sumitomo Chemical Group Sustainable Procurement Check Sheets and human rights questionnaire, collect responses, confirm the status of initiatives, and pursue engagement as necessary.

FY2024 Initiative Plans

To confirm the status of initiatives in line with the Sumitomo Chemical Group Supplier Code of Conduct, we will continue to broadly promote sustainable procurement in the supply chain by sending major suppliers, not only to the raw material suppliers, but also to the materials and equipment suppliers and the logistics suppliers, the Sumitomo Chemical Group Sustainable Procurement Check Sheets and human rights questionnaires, collect responses, and take improvement measures as necessary.

C. High-risk Raw Material DD

The Sumitomo Chemical Group formulated the "Sumitomo Chemical Group Policy for Responsible Procurement of Minerals/Raw Materials" in March 2020. Under the policy, the Group defines high-risk raw materials as those that having a high probability of negatively impacting human rights in the supply chain, including, but not limited to, tantalum, tin, gold, tungsten, cobalt, mica, graphite, and pulp. Depending on the characteristics of the high-risk raw materials, we promote initiatives aligned with the premise of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the OECD Guidance).

Initiatives in FY2023

In line with the Sumitomo Chemical Group Policy for Responsible Procurement of Minerals/Raw Materials, we conducted surveys of the usage status of high-risk raw materials at the Company and Group companies in Japan. As a result, we determined that we need additional confirmation for some of the raw materials source.

• FY2024 Initiative Plans

Regarding some of the raw materials mentioned above, we will conduct additional confirmation. As a result of the confirmation, if there are concerns, we will consider remedial measures to reduce human rights risks in line with the Sumitomo Chemical Group Policy for Responsible Procurement of Minerals/Raw Materials and continue implementing necessary initiatives. In addition, for business partners that handle high-risk raw materials, we will continue requesting reports based on the Responsible Minerals Initiative (RMI) and steadily promote risk assessments.

Procurement: Initiatives Related to High-Risk Raw Materials I Procurement: Initiatives Related to High-Risk Raw Materials

Sumitomo Chemical Group Policy for Responsible Procurement of Minerals/Raw Materials

https://www.sumitomo-chem.co.jp/english/sustainability/files/docs/ MineralandRawMaterialsPolicy.pdf

Grievance Mechanisms

We have grievance mechanisms in place in the form of the Speak-Up System (whistle-blowing channels) in order to address concerns about activities that may adversely impact human rights or any other concerns raised about our business activities. These channels are available for anyone involved in Sumitomo Chemical Group's business activities, including their business partners as well as Sumitomo Chemical Group Personnel and their families.

In addition, regarding harassment in particular, Sumitomo Chemical has established a harassment consultation office and consultants. We have set up systems to provide consultations for employees regarding various types of harassment, including power harassment, sexual harassment, maternity harassment, and SOGI harassment.*

Each of these aforementioned consultation offices accepts anonymous consultations and whistleblower reports. In the Compliance Manual, we make clear that the Company gives utmost consideration to protecting the privacy of the reporting person and maintaining the confidentiality of information provided and that the Company does not put people at any disadvantage, such as through dismissal, transfer, or discrimination, on the grounds of having received a consultation or made a report. We are raising awareness of these facts among employees.

Furthermore, at all aforementioned offices, in fiscal 2023, there were no confirmed cases related to discrimination and no major negative impact on human rights affecting the business continuation of the Group.

The Group will continue working to more effectively operate grievance mechanisms going forward.

* Harassment related to sexual orientation and gender identity

Compliance: Internal Reporting System (Speak-Up System)

Education and Awareness Raising

Our basic policy of respect for human rights is articulated in our Compliance Manual (Sumitomo Chemical Code of Business Conduct) and also communicated across through our intranet. In addition, our labor-management agreement makes it clear that an employee who damages the work environment for other employees through sexual speech and behavior, harassment, or other similar actions is considered violating our work regulations and thus subject to disciplinary action.

Under these principles, we value respect for an individual's personality, prohibiting any action to disrespect or disparage an individual's personality taken based on personal emotions or values or any harassment, bullying or similar speech or action.

We also prohibit all kinds of harassment, including power harassment and sexual harassment (including harassment of a person of the same gender and harassment of LGBTQ people regarding sexual orientation and gender identity).

In addition, we prohibit discrimination and do not allow any discriminatory action that is taken for reasons of employment type, age, gender, birthplace, ancestry, nationality, race, disability, religion, beliefs, marital status, or other such attributes and harms an individual's dignity. We particularly make it clear that discrimination based on gender or a difference in sexual orientation or gender identity and discrimination against people with disabilities are prohibited.

Raising Employees' Awareness of Human Rights

To ensure that each employee correctly understands and is fully aware of human rights issues, Sumitomo Chemical incorporates human rights in its employee education. We highlight human rights not only in the introductory training in which all employees participate after joining the Company but also in many other internal training programs, such as those for newly promoted employees (when promoted to a higher grade or a manager position) and those for recruiting interviewers.

In addition, we regularly implement awareness-raising training and initiatives at each site of our operations and each Group company. In fiscal 2023, based on the Sumitomo Chemical Group Human Rights Policy, a total of 36,028 people, including management executives and employees of Group companies, took training related to preventing discrimination against sexual and social minorities, harassment, and human rights violations; training related to preventing child labor, forced labor, and human trafficking; and e-learning training with the theme of "business and human rights—aiming to respect human rights through business."

Engaging in Human Rights Initiatives

Stakeholder Engagement Program Hosted by Caux Round Table Japan

Since fiscal 2019, Sumitomo Chemical has participated in the Stakeholder Engagement Program hosted by Caux Round Table Japan, a non-profit organization, to better understand what circumstances can cause human rights issues and how business activities are related to human rights, as well as material human rights issues and the importance of considering human rights in business activities.

This program invites companies, non-government and non-profit organizations, and experts to discuss human rights due diligence that is required by the Guiding Principles on Business and Human Rights. The subject for fiscal 2023 was "Human Rights Issues by Sector" formulated by the Nippon CSR Consortium in fiscal 2022. Participants engaged in sectoral discussion, referring to the human rights guidance tool created by the United Nations Environment Programme Finance Initiative (UNEP FI). (We participated in the discussion for the chemical, construction material, and manufacturing sectors.)

Fiscal 2023 Stakeholder Engagement Programme (Human Rights Due Diligence Workshop) Report

https://www.aoyama-syouji.co.jp/ir/esg/pdf/2023_SHE_final_ report_en.pdf 2

Stakeholder Engagement Program

https://crt-japan.jp/en/portfolio/human-rights-due-diligenceworkshop/ 27

Human Rights Due Diligence Subcommittee Hosted by Global Compact Network Japan

Since fiscal 2019, Sumitomo Chemical has engaged in the Human Rights Due Diligence Subcommittee hosted by the Global Compact Network Japan in order to promote human rights due diligence based on the Guiding Principles on Business and Human Rights.

In fiscal 2023, the subcommittee organized various initiatives such as seminars by experts and workshops related to human rights due diligence. We will continue to deepen our understanding of human rights by engaging in various initiatives, and leverage the learning in the Group's human rights promotion efforts.

Others

Signed onto the Declaration of Partnership Building

Sumitomo Chemical supports the premise of the "Council on Promoting Partnership Building for Cultivating the Future" promoted by Japan's Cabinet Office and the Small and Medium Enterprise Agency and announced our Declaration of Partnership Building. This initiative aims to encourage the collaboration of large companies with small and medium-sized companies, promote measures to enhance productivity across the entire supply chain, and build mutually beneficial relationships between large companies and small and medium-sized companies. In its declaration, Sumitomo Chemical not only clarifies as one of its individual items that it will conduct trade in a manner that ensures fairness and transparency but also clarifies that it emphasizes human rights and compliance and is promoting sustainable procurement initiatives throughout the supply chain to enforce sustainability initiatives at suppliers.

Announcement of our "Declaration of Partnership Building" (Japanese only)

Consideration for Human Rights in Investment

Along with interviews and legal due diligence for investment candidates, before acquisition we confirm consideration for human rights issues, response status, and the systems of investees.

Initiatives for the Rights of Children

The Sumitomo Chemical Group focuses efforts not only on eliminating child labor in Japan and overseas but also on educational support regarding respecting the rights of children.

Contributions to Communities 🗇