

# Human Rights Policy for the Sumitomo Heavy Industries Group

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## 1. Basic Concept

We, the Sumitomo Heavy Industries Group, engage in business activities through a strong sense of mission for society, under our corporate ethics, which is based on “Sumitomo’s Business Philosophy”, Sumitomo Heavy Industries’ Group’s “Purpose” and the “Business Principles”.

We have been manufacturing and repairing machines and equipment used at the Besshi Copper Mine, where Sumitomo Group originated, as one of our core businesses, and with our unique technological capabilities, we have contributed to the improvement of the labor environment through mechanization.

We promise to remain sincere in our approach to all our stakeholders and engage in the strongest possible efforts in our initiatives related to human rights.

In this policy, stakeholders include our employees, customers, business partners, regional populations, shareholders and investors, etc.

## 2. Role of This Policy and Scope of Application

This policy is a top-level policy on human rights that applies to all executives, employees, and dispatched employees engaged in work for the Sumitomo Heavy Industries Group businesses (hereinafter, “Executives and Employees, etc.”).

In addition, we believe that it is important to implement this policy with all of our business partners such as our customers and business partners. We will ask our business partners to understand and implement this policy, guidelines for procurement, and other matters in order to work together to realize our responsibilities to society.

## 3. Compliance with International Standards, Laws, and Regulations

Throughout our business activities, we will support and conform with international standards defined in consideration of respect for basic human rights that all people across the world should be able to enjoy. (These include the UN’s “International Bill of Human Rights”, and “Guiding Principles on Business and Human Rights”, the ILO’s “Declaration on Fundamental Principles and Rights at Work” and “OECD Guidelines for Multinational Enterprises”.) Moreover, we will strive to implement a thorough compliance with the laws and regulations of the countries and regions in which we conduct our business activities.

If there is a discrepancy between the laws and regulations of the country or region where we operate and international human rights norms, we will pursue ways to remedy the problem in

accordance with higher standards.

#### **4. Responsibility for Respecting Human Rights**

We understand that our business activities may adversely affect human rights directly or indirectly. We endeavor to realize our responsibility to respect human rights by giving the maximum possible consideration to how we will not infringe upon the human rights of our stakeholders and to take appropriate actions to that end.

- (1) We will not tolerate discrimination in any form, including discrimination based on age, nationality, race, ethnicity, place of origin, religious affiliation, creed, political beliefs, marital status, family structure, gender, sexual orientation, gender identity, disability, or employment status.
- (2) We will not allow acts of harassment of any kind that harm the dignity of an individual, such as sexual harassment and power harassment, and will seek to establish an organizational culture with good communication oriented towards ensuring psychological security.
- (3) In order to acknowledge the diversity and values among us and to maintain a workplace in which each individual will be motivated to work, we will consider the promotion of diversity to be a major theme of management. In addition, we will also actively pursue initiatives in fields such as freedom of association, negotiations between labor and management, and industrial health and safety, and through engagement with employees, etc., and provide a safe workplace environment where it is easy to work.
- (4) We will not tolerate human trafficking; forced labor through violence, threats, or debts; child labor; or modern slavery.

#### **5. Human Rights Due Diligence**

We will seek to understand and evaluate risks related to human rights, establishing with third-party organizations, and implementing on an ongoing basis a series of mechanisms for verifying and improving upon the effects of our efforts (human rights due diligence).

#### **6. Dialog**

We will actively engage in dialog and consultations with our stakeholders in an effort to improve our efforts related to the respect of human rights.

#### **7. Training**

We will conduct appropriate training with an aim to have our Executives and Employees, etc. accurately understand this policy and implement it throughout their business activities. We will also actively encourage our business partners to share good practices so that they can put this policy into practice.

## **8. Access to Remedy**

If we identify any cases where our business activities have adversely affected human rights directly or indirectly, we will promptly pursue actions to provide remedy through the appropriate measures and endeavor to rectify the situation together with our business partners, if necessary. Throughout this process, we will prohibit any disadvantageous treatment such as reprisals against whistleblowers and protect any such persons.

## **9. Information Disclosure**

We will regularly disclose information, through channels such as our company website or reports, regarding the progress of our efforts to respect human rights described in the provisions of this policy.

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