

# Human Rights Policy for the Sumitomo Heavy Industries Group

Announced February 13, 2023

Effective February 13, 2023

Revised July 31, 2024

Revised July 30, 2025

## 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 are based on “Sumitomo’s Business Philosophy” as well as the Sumitomo Heavy Industries Group’s “Purpose” and “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 will remain sincere in our approach to all our stakeholders and engage in the strongest possible efforts related to respecting 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 ensure that our business partners understand and implement this policy, guidelines for procurement, and other matters as we realize our responsibilities to society together.

## 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”.)

In addition, we will implement the ten principles of the UNGC (United Nations Global Compact), fulfilling our responsibilities with respect to the four defined categories of said compact: human rights, labor, the environment, and anti-corruption.

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) Prohibition of discrimination**

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) Prohibition of harassment**

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) Promotion of diversity**

We consider the promotion of diversity to be a major theme of management, and will respect the diverse characteristics present among individuals, maintaining a workplace that values mutual respect and where anyone can be motivated to work without having to sacrifice who they are.

##### **(4) Respect for freedom of association and the right to collective bargaining**

We respect workers' freedom of association and their rights regarding collective bargaining. Further, we will ensure that workers are not disadvantaged by their participation in legitimate labor movements and that a fair and impartial relationship between labor and management is established.

##### **(5) Prohibition of forced labor, child labor, and similar acts**

We will not tolerate human trafficking; forced labor through violence, threats, or debts; child labor; or modern slavery.

##### **(6) Provision of a safe and healthy working environment**

We will actively engage in matters related to occupational safety and health, providing an environment in which safety and health are easily maintained during work and in which no disasters or accidents occur.

(7) Payment of suitable wages

In addition to respecting the laws and regulations concerning wages in the countries and regions in which we do business, we will define compensation that is sufficient as a basic living wage and pay according to such definitions.

(8) Management of work time

We will appropriately manage working hours based on the applicable laws and regulations and promote systems that ensure sufficient holidays and vacation days.

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

We will act in accordance with the UN Guiding Principles on Business and Human Rights, working together with third-party organizations to implement human rights due diligence on an ongoing basis.

Through these activities, we will identify negative impacts on human rights and take steps to prevent or mitigate such impacts.

## **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. Encouragement of Training and Understanding**

With respect to our Executives and Employees, etc., we will conduct ongoing training to ensure that this policy is sufficiently implemented throughout the business activities of the Sumitomo Heavy Industries Group.

We will also actively establish information-sharing and cooperative opportunities with our business partners to ensure that the promotion of respect for human rights is present throughout our entire supply chain.

## **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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