

Sumitomo Rubber Group Human Rights Policy

1. Our Approach on Respect for Human Rights

(1) Commitment to Respect Human Rights

The Sumitomo Rubber Group (“we”) regards our purpose as “Through innovation we will create a future of joy and well-being for all,” which is defined by our corporate philosophy. We recognize that understanding and addressing human rights issues that may arise in our global business is fundamental to embodying this purpose in our business activities.

We understand that our business activities may have impacts on human rights of both internal and external stakeholders in each process of our value chain from the procurement of raw materials to the sales of products and services. We strive to respect human rights throughout our entire value chain.

(2) Positioning and Scope of the Human Rights Policy

The Sumitomo Rubber Group Human Rights Policy (“Policy”) sets forth our approach specifically to respecting human rights based on our ethical action guideline, “[Code of Conduct](#).” This Policy governs all other rules and guidelines related to human rights within the Sumitomo Rubber Group.

This Policy applies to all executives and employees within our group, as well as to the facilities under our management. Furthermore, we expect our business partners to support this Policy, and we also expect that our suppliers understand and comply with this Policy.

(3) Respecting International Human Rights Standards

We recognize the human rights stated in the Universal Declaration of Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work as rights that must be upheld. We work to respect human rights, adhering to the OECD Guidelines for Multinational Enterprises and the Guiding Principles on Business and Human Rights. Being a signatory of the United Nations Global Compact, we endorse its ten principles.

Throughout our business activities, we comply with the laws and regulations of each country and region. Where local laws and regulations and international human rights standards differ, we strive to follow higher standards, and where they have conflicts, we seek ways to respect international human rights standards to the greatest extent possible.

2. Implementation of Human Rights Due Diligence

(1) Management System and Responsibilities for Respecting Human Rights

This Policy has received approval from the Board of Directors, and the Chief ESG Officer is entrusted to oversee its compliance and implementation. The Sustainability Promotion Committee and human resources department will collaborate with related companies and divisions within the Group to implement day-to-day human rights efforts.

(2) Addressing Adverse Impacts on Human Rights

In accordance with the United Nations Guiding Principles on Business and Human Rights, we will identify and assess adverse impacts on human rights related to our business activities. Furthermore, we will take measures to prevent and mitigate these impacts. In cases where we identify that we have caused or contributed to adverse human rights impacts, we seek to remediate such impacts through appropriate measures.

(3) Remedies

Our executives, employees, and stakeholders worldwide can report their concerns or potential violations of this Policy related to business activities through [the Corporate Ethics Helpline](#). In cases where a local (in-house) compliance office is available, individuals may also seek guidance from either the local (in-house) compliance office or the Corporate Ethics Helpline.

All consultations and reports made in accordance with this policy will be handled with the utmost privacy protection, and no retaliatory actions will be taken against the person making a consultation or report. All consultations and reports will be investigated and addressed, and we will take appropriate corrective actions in the event in which any violations are identified.

(4) Respect for the Human Rights of Stakeholders

We uphold the human rights of all stakeholders related to our business (our employees, customers, suppliers, business partners, local residents including indigenous people, etc.). We strive to understand adverse impacts on human rights associated with our business activities from the perspective of those who are or may be affected. We will continuously engage in dialogue with our stakeholders regarding human rights issues relevant to us and advance our human rights efforts.

(5) Training and Education

We will conduct training for our executives and employees to ensure their understanding of this Policy and actions aligned with this Policy

(6) Information Disclosure

We will continuously monitor the implementation of this Policy and make necessary improvements as required. Our progress in embedding this Policy into our business activities and fostering a culture of respect for human rights will be regularly disclosed through our website, integrated reports, and other communication channels.

November 10, 2023

Sumitomo Rubber Industries

President and CEO, Representative Director, Satoru Yamamoto

