



SUMITOMO RUBBER GROUP HUMAN RIGHTS REPORT 2025

(May 2025)



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TOP COMMITMENT

A Spirit of Harmony, Coexistence and Mutual Prosperity is Embedded in the Sumitomo Business Philosophy

Sumitomo Rubber Industries is built upon the Sumitomo Business Philosophy, a philosophy cultivated for roughly 400 years. Since our founding, we have engaged in a wide array of business activities.

Our story begins when, to fulfill his young son's desire for a better bicycle tire, John Boyd Dunlop invented the pneumatic tire, which he later introduced to the wider public. Since this pivotal moment more than a century ago, we have relentlessly pursued rubber-based innovation, delivering multiple products that have been not only Japan firsts but world firsts.

My interactions with domestic and international customers and investors have reaffirmed that our sustained business stability stems from consistently meeting customer expectations, maintaining strong relationships with business partners and earning the trust and understanding of the communities who support us.



An Organizational Culture Essential to Realizing Our Philosophy

The Sumitomo Rubber Group's corporate philosophy, or "Our Philosophy," is based on the Sumitomo Group's Business Philosophy. Formulated in 2020, it is aimed at facilitating the ongoing unified advance of our richly diverse, roughly 40,000-people strong workforce.

To spread awareness of Our Philosophy, I have visited individual Group companies and engaged in extensive direct dialogue with employees. Based on insights gained through conversations with employees and on-site initiatives, I believe that building a culture in which our diverse global talent demonstrates mutual respect, engages in candid dialogue and enjoys working with external stakeholders is indispensable to realizing our Purpose: "Through innovation we will create a future of joy and well-being for all." Building this type of organizational culture is the very embodiment of respecting human rights—and is therefore an important principle we will continuously reiterate moving forward.

Joy and Well-Being for All Stakeholders

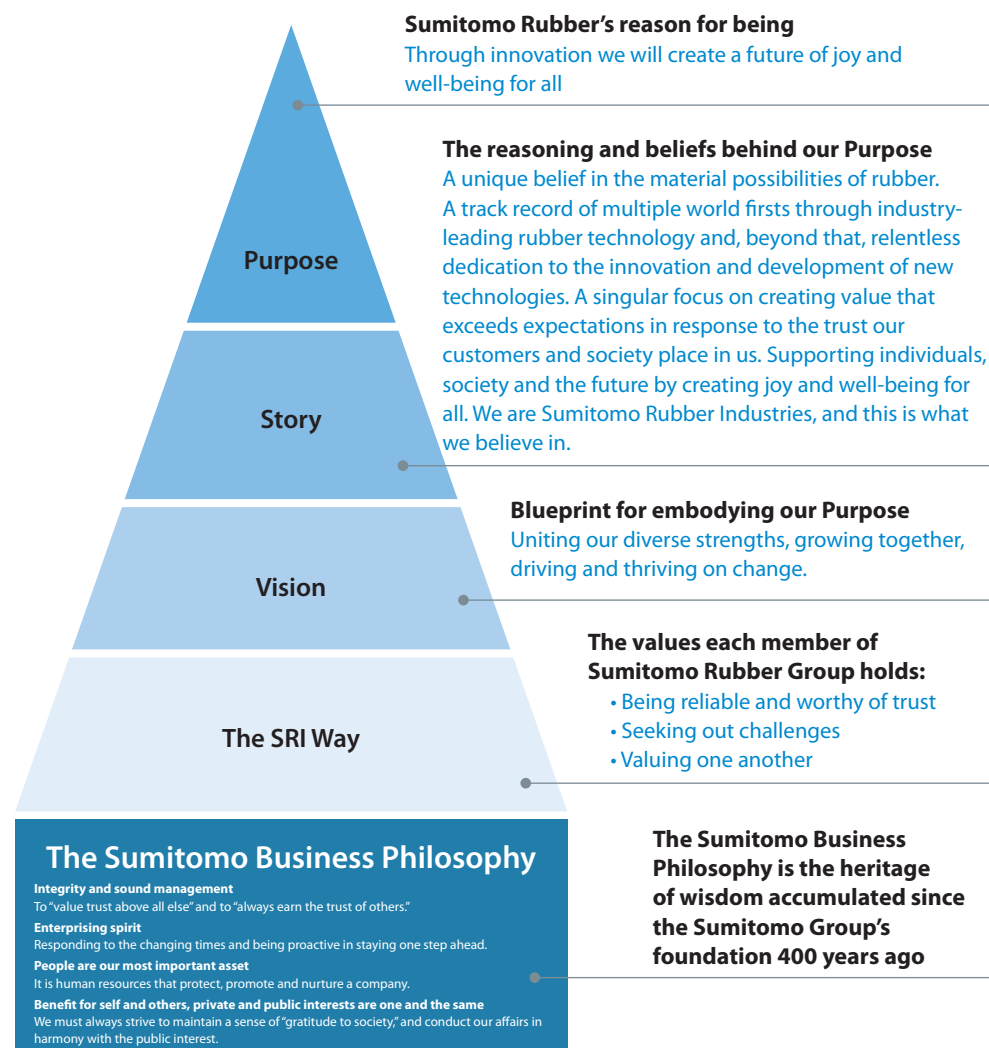
From materials procurement to product delivery, our business operates globally across the entire value chain, engaging with diverse stakeholders at every stage.

To truly embody the Sumitomo Rubber Group's Purpose of "Through innovation we will create a future of joy and well-being for all" for every stakeholder, every employee must understand potential human rights issues across our global operations and act in accordance with both the Sumitomo Business Philosophy and Our Philosophy.

To remain a trusted Company in the decades to come, we will implement this core philosophy when expanding our business, maintaining respect for every stakeholder's dignity.

President and CEO, Representative Director
Sumitomo Rubber Industries, Ltd.

Our Philosophy, the Sumitomo Rubber Group's Corporate Philosophy Structure



Overview of the Sumitomo Rubber Group

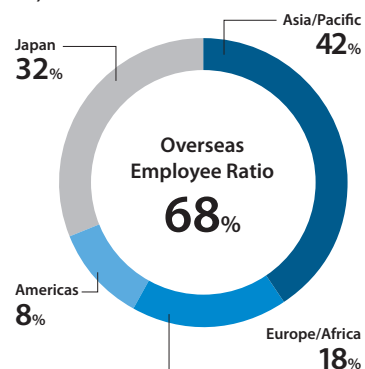
Our Businesses

Employees

- Number of Employees (consolidated)

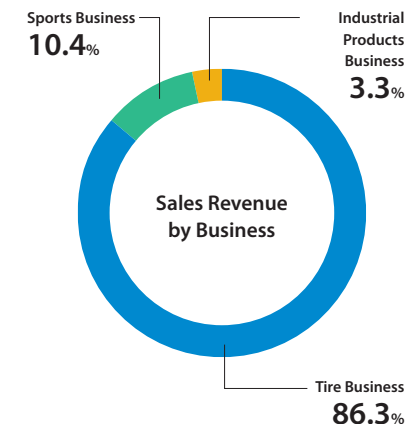
37,995

(As December 31, 2024)



FY2024 Consolidated Performance

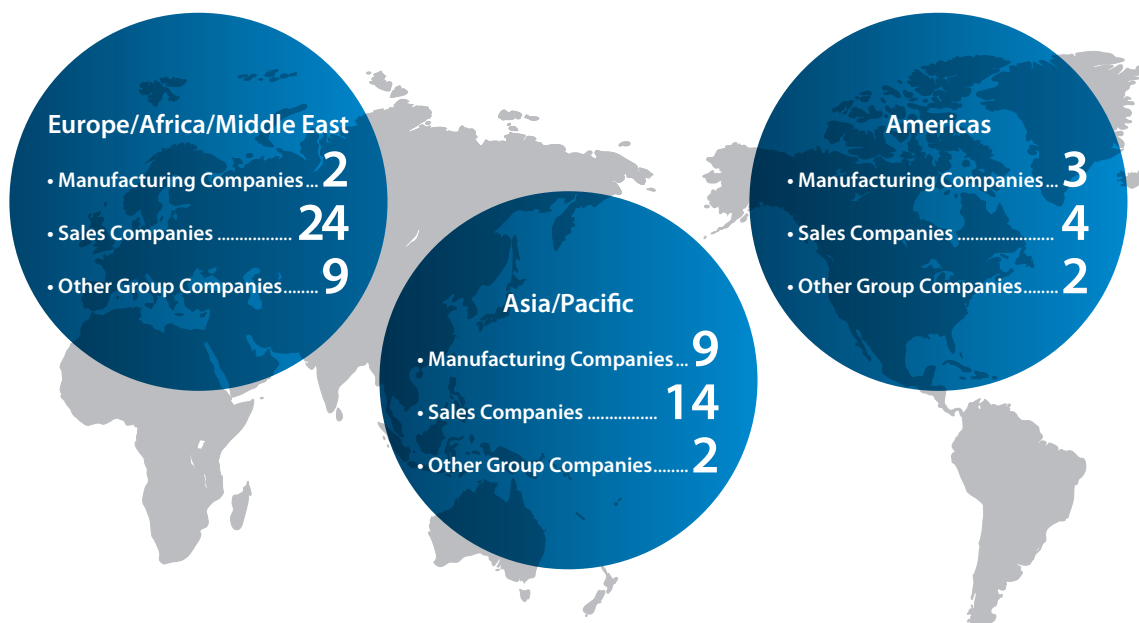
• Total Sales Revenue **¥1,211.9 billion**



Business Regions

Global Locations

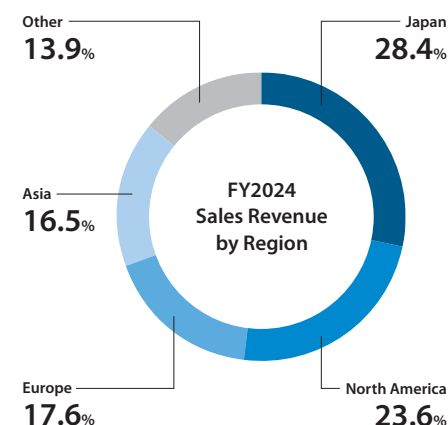
As of February 28, 2025



Domestic Locations/ Major Group Companies

As of February 28, 2025

- Offices..... **4**
- Production Bases..... **6**
- R&D Bases..... **5**
- Major Group Companies..... **13**

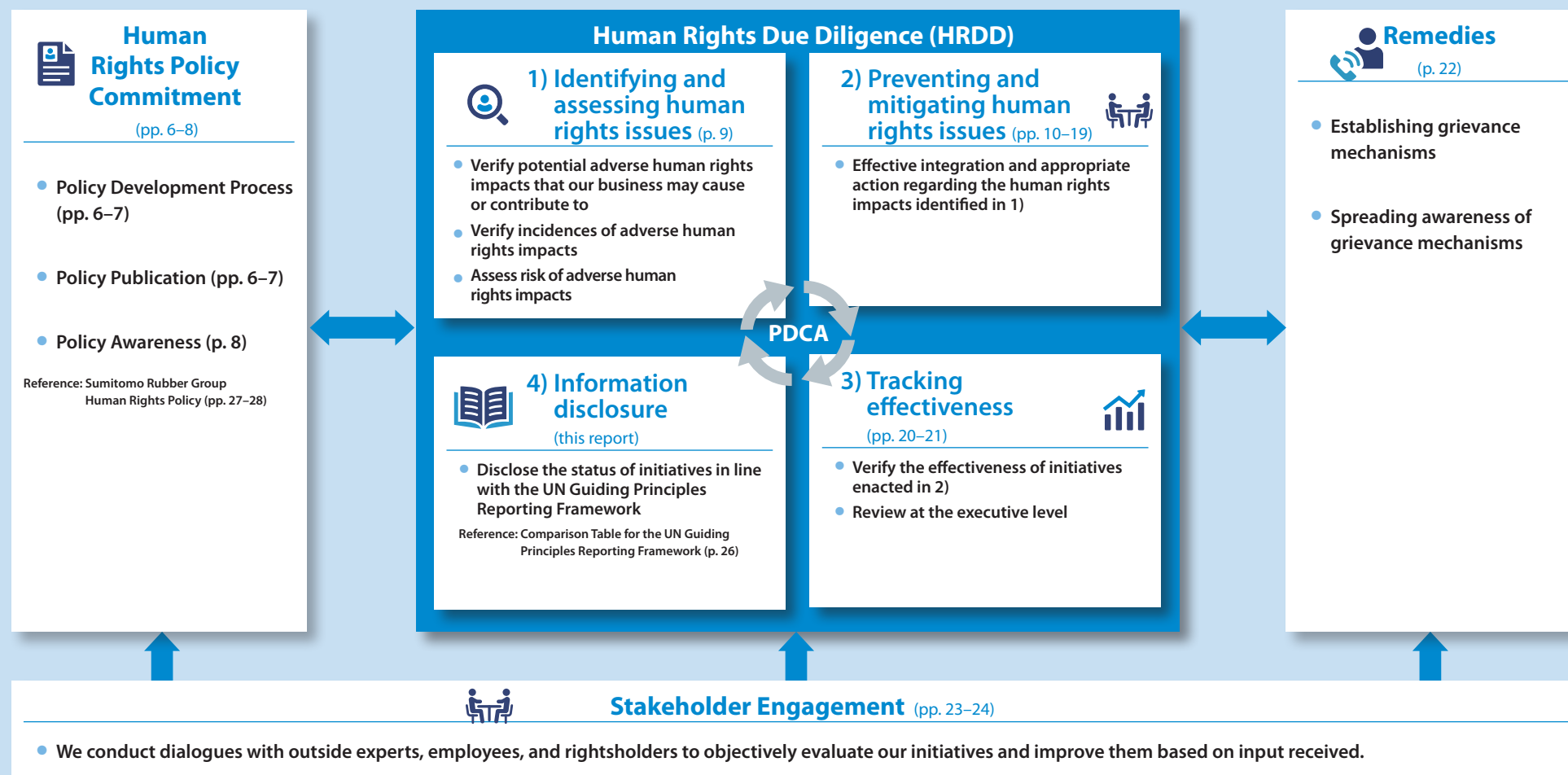


Our Activities at a Glance

The Company references materials based on the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, such as the Due Diligence Guidance for Responsible Business Conduct issued by the Organisation for Economic Co-operation and Development (OECD) and the Ministry of Economy, Trade and Industry's Guidelines on Respect for Human Rights in Responsible Supply Chains, in its formulation and pursuit of the following initiatives to ensure respect for human rights.

Details regarding these initiatives are provided on the specified pages.

Establishing Frameworks (p. 5)



* Human Rights Due Diligence (HRDD): Assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses and communicating how impacts are addressed.

Human Rights Management System

Basic Perspective

We regard upholding human rights as a basic corporate obligation as well as an important component of managing risk in our business operations. To implement comprehensive and systematic initiatives across all domestic and international business sites and throughout our value chain, we established a Human Rights Subcommittee under the Sustainability Promotion Committee,*¹ which reflects the following perspectives in its operations.

- 1) Under the supervision of the Board of Directors, the Subcommittee establishes human rights as a priority material issue,*² including said issue in Company frameworks
- 2) As a cross-functional working group under a unified framework, the Subcommittee can comprehensively handle human rights issues while incorporating diverse perspectives
- 3) Through regular reviews undertaken by the Sustainability Promotion Committee, the Subcommittee is able to track the progress of initiatives

☑ *1 Sustainability Management Structure

☑ *2 The Sumitomo Rubber Group's material issues (materiality)

Overview of the Human Rights Subcommittee

The Human Rights Subcommittee includes representatives from Head Office management and all corporate departments as well as from domestic and overseas locations. It strives to deepen our understanding of human rights and disseminate knowledge of initiatives to all employees.

Additionally, the secretariat regularly reviews policy adoption and risk response progress across all departments and locations, reporting its findings to executive management (p. 20).

Activities

	Target	Frequency	Details
Regular meetings	Entire Group	3–4 times a year, in principle	<ul style="list-style-type: none"> Implementing policies Reviewing initiatives and issues at all departments Highlighting positive examples, etc.
Individual meetings and on-site inspections	Areas and locations that have been flagged for having possible issues	Whenever necessary	<ul style="list-style-type: none"> Verifying the details of human rights issues Conducting discussions regarding policies and responses to address issues, etc.

Risk Management Systems

To prepare for the potential emergence of human rights risks, we have established a system that enables immediate reporting to management through business collaboration between the Corporate Ethics Committee and the Risk Management Committee.

Collaboration with the Corporate Ethics Committee

Corporate Ethics Helpline

In cases where we receive inquiries or reports related to human rights from employees or business partners, the Corporate Ethics Committee passes relevant information on to the Human Rights Subcommittee, which, in turn, reviews it and determines a course of action.

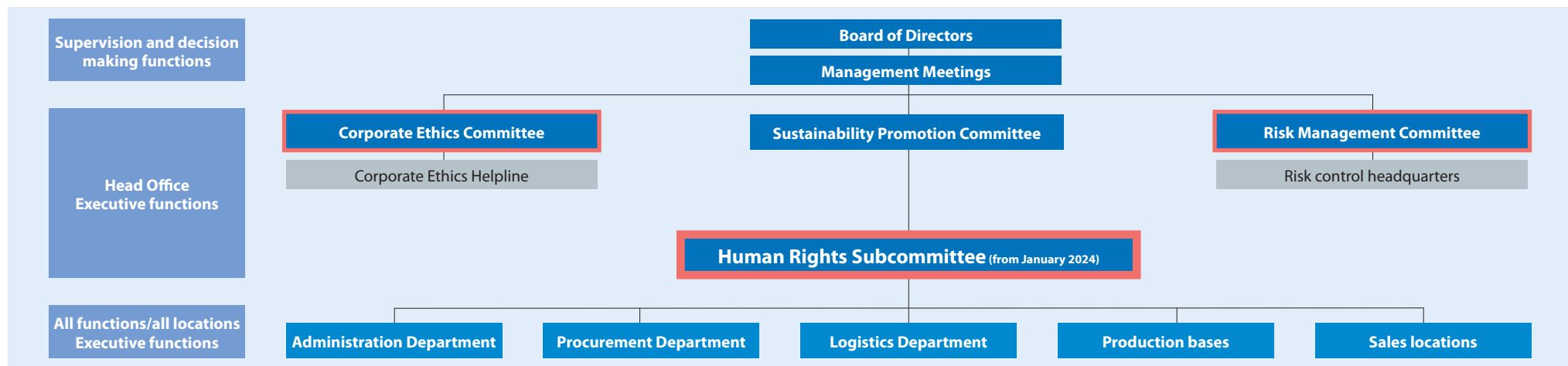
Regular compliance training

We engage in activities to ensure that every employee is aware of the importance of complying with all laws and regulations. In 2024, we set reviewing our Human Rights Policy and spreading awareness of the Corporate Ethics Helpline (grievance mechanism) as key themes and carried out activities to promote company-wide awareness of laws and regulations pertaining to human rights and other issues.

Collaboration with the Risk Management Committee

Should a significant human rights risk emerge, we will establish a risk control headquarters under the Risk Management Committee and collaborate with the Human Rights Subcommittee in taking appropriate action.

Promotion system



Our Policies

Basic Perspective

To clearly communicate our commitment to fulfilling our responsibility to respect human rights to all stakeholders, we have formulated the Human Rights Policy with the following three points in mind.

- 1) Welcome advice from specialists well-versed in business and human rights
- 2) Members leading policy formulation will check the guidelines provided by international organizations and proceed in accordance with them
- 3) Select items that are consistent with "Our Philosophy"

Furthermore, the Human Rights Policy will be revised as needed in accordance with measures to spread awareness of it as well as of the results of conducting Human Rights Due Diligence.

Policy Development Process



Sumitomo Rubber Group Human Rights Policy

In November 2023, we established the Sumitomo Rubber Group Human Rights Policy (hereinafter the Policy) based on the International Bill of Human Rights (Universal Declaration of Human Rights and the International Covenants on Human Rights), the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO), the Ten Principles of the UN Global Compact, and the UN Guiding Principles on Business and Human Rights.

- ☑ **Human Rights Policy (Japanese)**
- ☑ **Human Rights Policy (English)**
- ☑ **Signing the UN Global Compact (News release published in Japanese May 25, 2022)**

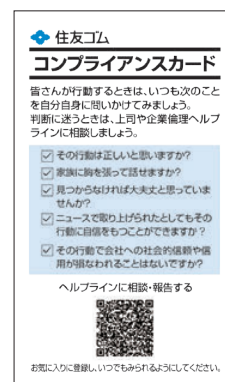
The Policy is based on the guidelines for conducting ethical business activities in the Company's Corporate Code of Conduct and was established specifically to codify our perspective on respect for human rights.

The Policy serves as our highest-level framework for all guidelines and regulations regarding respect for human rights within the Sumitomo Rubber Group.



The Company's Corporate Code of Conduct (various languages)

- ☑ **Japanese** ☑ **English**
- ☑ **Chinese** ☑ **Thai**
- ☑ **Indonesian** ☑ **Vietnamese**
- ☑ **Turkish** ☑ **Spanish**



Compliance Cards

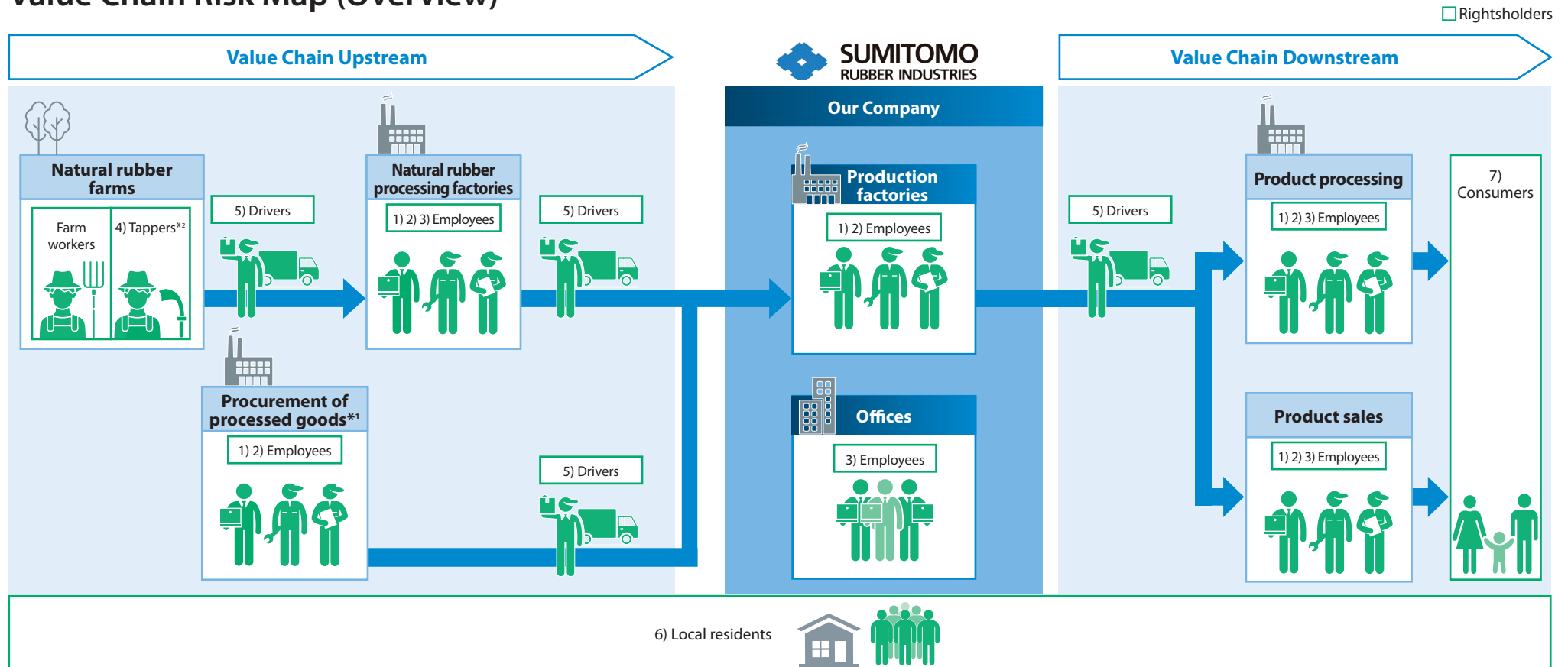
Other Human Rights-Related Policies

The Sumitomo Rubber Group has formulated various policies from the perspective of human rights and is conducting human rights-related initiatives throughout the entire value chain.

Environment E	☑ Environmental Policy	Enacted 2024
	☑ Environmental Policy (Appendix)	
	☑ D&I Top Commitment	Enacted 2022
	☑ Procurement Guidelines 8th Edition [Raw materials for tire]	Enacted 2004 Revised 2024
	☑ Sustainable Natural Rubber Policy	Enacted 2018 Revised 2021
	☑ Multi-Stakeholder Policy (Japanese only)	Enacted 2024
Social S	☑ Basic Policy on Customer Harassment (Japanese only)	Enacted 2024
	☑ Quality Policy	Enacted 1999 Revised 2022
	☑ Corporate Governance Report	Enacted 2015 Revised 2025
Governance G	☑ Basic Perspective on Taxes (Japanese only)	Enacted 2020

☑ **Overview of sustainability-related policies**

Value Chain Risk Map (Overview)



Rightsholders	Expected risks
1) Employees (workers)	<ul style="list-style-type: none"> • Dangerous/unsafe working environment • Harassment • Discrimination based on sex, employment status, etc. • Imposition of longer working hours via abrupt schedule changes
2) Employees (foreign workers/migrant workers)	In addition to the risks covered by 1), <ul style="list-style-type: none"> • Discrimination based on religion or nationality as well as disparities in employment opportunities • Forced labor
3) Employees (office workers)	<ul style="list-style-type: none"> • Harassment • Discrimination based on sex, employment status, etc.
4) Tappers*2	<ul style="list-style-type: none"> • Forced labor/child labor • Dangerous/unsafe working environment • Excessive decline in income due to worsening market conditions (failure to pay a living wage)

Rightsholders	Expected risks
5) Drivers	<ul style="list-style-type: none"> • Dangerous/unsafe working environment • Increase in accident risk due to the aging of drivers, notably in Japan • Imposition of longer working hours via abrupt schedule changes
6) Local residents	<ul style="list-style-type: none"> • Forced relocation (violations of land rights) • Oppression of indigenous groups • Exhaustion of water resources • Pollution of water or land • Violations regarding relocation of residents
7) Consumers	<ul style="list-style-type: none"> • Sales of hazardous products • Risk of procuring products linked with adverse human rights impacts

*1 Processed goods: Non-rubber components used in the manufacture of tires (wires, etc.)

*2 Tappers: On-site workers responsible for harvesting latex from rubber trees

Promoting Human Rights Awareness

Basic Perspective

As a corporate entity, the Group has a responsibility to ensure that human rights are respected and, accordingly, emphasizes that human rights are integral to “Our Philosophy” while conducting activities to promote awareness.

Reference: Materials for an employee seminar on human rights


Our Philosophy × 人権

テーマ：住友ゴムグループの社員として人権を尊重するとは？

Our Philosophyと人権

Our Philosophyの住友ゴムWayに「信用と確実を旨としよう」「お互いを尊重しよう」とあるように「人権の尊重」はOur Philosophyの実現にとって土台・前提となる要素です。

Our Philosophyの実現に向け、人権に関する身近なトピックを通し、「日常業務において人権を尊重するとはどのようなことなのか」について、理解しましょう。



なぜ人権尊重が求められるのか？

昨今、企業活動における人権遵守への注目度が高まっている

住友ゴムで働く一人ひとりが企業に求められる責任と、日常業務において留意すべきことを理解し、お互いを尊重し、周りから信頼される企業であり続けるために必要なことを学びます。

Content of Initiatives

Spreading awareness of the Human Rights Policy to all employees

So that employees understand that respect for human rights is a unified Company policy, we have made “The Human Rights Policy” the topic of our annual Corporate Ethics Month in October and are spreading awareness of this policy among all employees, including part-time and temporary employees.

Contents

- 1) Sharing the “President’s Thoughts Regarding Respect for Human Rights”
- 2) Reading and reviewing the Human Rights Policy at all workplaces
- 3) Spreading awareness of the Corporate Ethics Helpline in a manga-style version of the in-house newsletter

Enhancing understanding among Human Rights Subcommittee members

Knowledge and understanding of human rights varies among the Human Rights Subcommittee members. With the goal of gaining a deeper, practical understanding, members participate in external seminars and conduct study sessions.

Contents

- 1) Participation in the UNDP*-sponsored “Business and Human Rights Academy”
- 2) Participation in various ministry- and agency-sponsored “Human Rights Seminars”
- 3) Participation in “Information Exchange Sessions,” etc., with other companies

* UNDP: United Nations Development Programme

Human rights seminars by job category

In order to deepen understanding regarding human rights and their associated risks, as well as to foster consciousness toward human rights, Mr. Hideaki Umetsu, a lawyer specializing in international business and human rights (from the legal firm Mori Hamada & Matsumoto) provided us with a lecture course.

We designed the program to help participants acquire more practical knowledge by presenting specific case studies and addressing issues relevant to specific job categories.

[For top management] (FY2023)

Date held	Content
December	<ul style="list-style-type: none"> • Reasons why it is necessary for the Board of Directors to understand human rights initiatives • Priorities after establishing the Human Rights Policy

[For top management and managers] (FY2024)

Date held	Content
September	<p>Understanding the importance of HRDD</p> <ul style="list-style-type: none"> • Why initiatives related to respect for human rights are important in business • Social trends around human rights and corporate responsibilities • Potential risks and responses, etc., that managers face in their respective departments <p>Points:</p> <ul style="list-style-type: none"> • Understanding the targets established in the Human Rights Policy • The human rights-related initiatives desired by managers • Specific examples of human rights issues

[For employees] (FY2024)

Date held	Content
September	<p>Understanding the importance of HRDD</p> <ul style="list-style-type: none"> • Why initiatives related to respect for human rights are important in business • Social trends around human rights and corporate responsibilities • Understanding the underlying human rights risks at all workplaces and in all operations, etc. <p>Points:</p> <ul style="list-style-type: none"> • Potential human rights issues confronted in the course of one’s duties • Surveys after seminars —Understanding issues as they apply to oneself

Message



Shinichiro Hiruta

Human Resources & General Affairs HQ
Human Resources Department General Manager

So that individual employees are able to work with peace of mind and fully demonstrate their abilities, it is essential that human rights are respected in workplace environments. We recognize that human rights risks are always present and have thus created environments in which bad news is received expeditiously, allowing for quick and conscientious responses.

Embodying and practicing the SRI Way of “Valuing one another” is the first step in this process. We continually work to improve our consciousness regarding human rights through harassment prevention training and education on unconscious bias while also promoting the creation of workplaces that can ensure psychological safety.

In addition, we utilize 360-degree feedback and surveys on organizational composition for top management and leaders, creating opportunities to find and redress one’s own actions and workplace environments on an objective basis. Through such initiatives, we listen to voices from on-site locations and foster the conscious exercise of respect for human rights across our entire organization.

We will continue to proactively promote the creation of environments in which all employees can demonstrate their abilities with peace of mind.

Identifying and Assessing Human Rights Issues

Basic Perspective

As the first step of Human Rights Due Diligence (HRDD), we identify and assess risks based on discussions between the Head Office, which is the secretariat of the Human Rights Subcommittee, and related departments, as well as through internal Company materials regarding human rights risks that the Company contributes to or may contribute to.

However, the environment around business and human rights is continually changing. Through on-site inspections across the value chain and dialogue with stakeholders, we continuously review and, as necessary, update our "priority human rights issues."

Identification and Assessment Process for Human Rights Issues

STEP 1

Verifying potential human rights risks in business regions

We reference various reports and websites published by international organizations to verify risks from the following perspectives

- Human rights risks intrinsic to different types of businesses (tires, sports, industrial products)
- Human rights risks related to materials used in Company products (natural rubber)
- Human rights risks by country at Company locations

STEP 2

Verifying human rights risks

Working with members familiar with operations, we analyze internal information to verify what human rights issues are present

- Content of inquiries made to the Corporate Ethics Helpline
- Occurrences of workplace accidents and their background, contents of near misses
- Content of litigation, etc.

STEP 3

Assessing human rights risks

We receive specialized advice from outside sources, then assess the degree of severity regarding each risk from the following perspectives

- Scale: How many people could be affected/How severe the impact could be
- Scope: Who would be impacted
- Remediability: Difficulty of a return to present operations after a negative impact

Identifying Important Human Rights Issues

Based on assessments of human rights risks, the importance of each risk is carefully assessed, and through discussions at Management Meetings, the Company identifies important human rights issues to be prioritized.

As a global company, we work together with each of our departments and locations to prevent and mitigate risks.

Issues	Background	Goal	Initiatives	
			Employees	Value chain
Occupational safety and health	<ul style="list-style-type: none"> • Due to the nature of rubber, processing requires the use of manual labor. The resulting close proximity of workers to manufacturing equipment thus heightens the level of accident risk • At certain stages of production, heat treatment is necessary, making workplaces prone to becoming overheated • Risks have materialized due to the occurrence of workplace accidents 	Safe and healthy workplaces	(pp. 10–11)	(pp. 16–19)
Harassment	<ul style="list-style-type: none"> • Bias is not seen at selected departments and locations, but a certain number of cases are confirmed • Understanding of and responses to harassment vary by country, region, and location, leading to underreporting in some instances. 	Workplaces in which diverse characteristics and ways of thinking are respected and all individuals can demonstrate their abilities <ul style="list-style-type: none"> • Gender, sexual orientation, disabilities • Employment status and type • Nationality, religion, etc. 	(pp. 12–13)	
Prohibition of discrimination and equality under law	<ul style="list-style-type: none"> • Improvements to the gender gap are necessary, such as in average salaries for men and women as well as in the ratio of female managers • Physical exertion is required of workers at production sites, therefore environments must be built such that diverse members can work 			
Rights of foreign workers	<ul style="list-style-type: none"> • Foreign workers prone to suffering disadvantages are employed at factories and within the value chain • The employment status of foreign workers throughout the entire value chain is difficult to trace 		(pp. 14–15)	
Forced labor	<ul style="list-style-type: none"> • Natural rubber, a major raw material, is listed by international organizations as a product associated with a heightened risk of forced labor or child labor* • Supply chains around natural rubber are complex and difficult to fully understand, so there is a need for proactive confirmation 	Just and sustainable procurement of natural rubber	—	
Child labor				

* Reference Material on Practical Approaches for Business Enterprises to Respect Human Rights in Responsible Supply Chains (Ministry of Economy, Trade and Industry)

Our Approach (Own Workforce): Occupational Safety and Health

Basic Perspective

The Company seeks happiness for all Group employees, and to create safe and healthy workplaces in which it is easy to do one's job, has taken up the slogan "Occupational safety and health must be prioritized over anything else" as it strives for zero occupational accidents.

The Central Safety and Health Committee has established the "Sumitomo Rubber Group Safety and Health Activity Policy," bringing labor and management together to continually improve occupational safety and health activities which all employees participate in.

This policy applies to Group employees, as well as to employees of contractors and even stakeholders visiting Company-related establishments.

Sumitomo Rubber Group Safety and Health Activity Policy

1. Prioritize nurturing "safety oriented human resources" with heightened risk awareness and who consistently behave safely
2. Achieve hazard-free workplaces with zero occupational accidents by improving workplace environments and ensuring managers and supervisors fulfill their responsibilities
3. Respect various laws related to occupational safety and health, and properly respond to matters requested by outside organizations

Review and Issues from Fiscal 2024

We were able to achieve the Sumitomo Rubber Group's target of zero major accidents for the second consecutive year, however, accidents that could lead to such incidences did occur.

Because of this, we are working to properly detect the varying risks at every workplace and are expanding our human resources to help us approach our safety-related KPIs (refer to the "Fiscal 2025 Targets" below).

Mid- to long-term target	Increase knowledge on safety and accident prevention, create workplaces in which workers can protect each other, and realize ESG management toward working with peace of mind
Fiscal 2024 Results	<ul style="list-style-type: none"> • Major accidents: 0 • Risk assessment managers developed: 114 individuals
Fiscal 2025 Targets	<ul style="list-style-type: none"> • Major accidents: 0 • Risk assessment managers to develop: 50 individuals (striving for successful completion among all members worldwide) • Safety-related KPIs: Strive for 3 or higher in an all-personnel 5-level evaluation

☑ Sumitomo Rubber Group Occupational Safety & Health

☑ Dunlop Golf Clubs Achieves a Record 8.1 Million Hours with No Accidents, Certified by the Ministry of Health, Labour and Welfare (Japanese only)

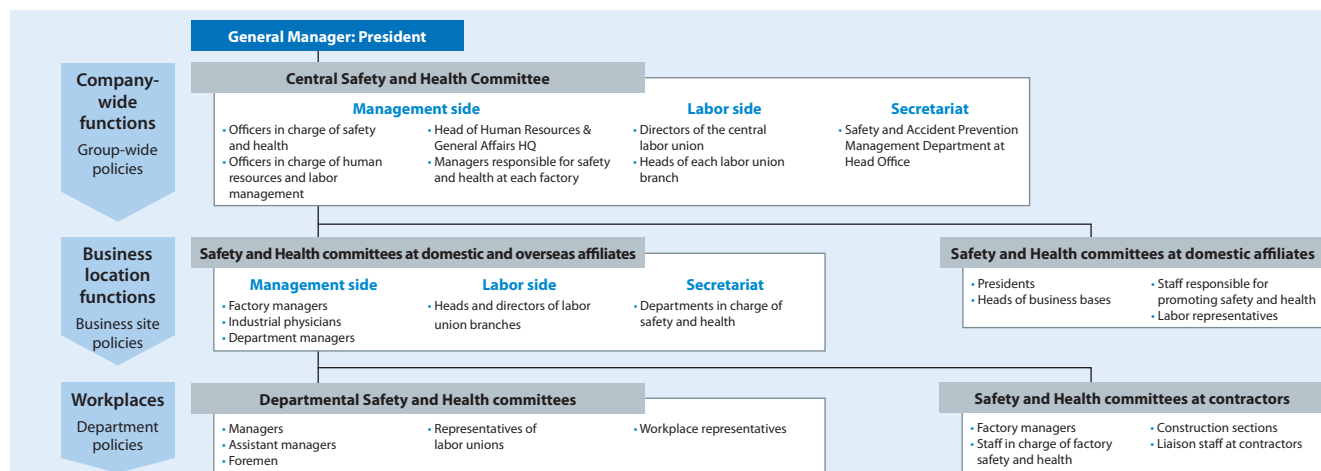


External Evaluations and Certifications as of Fiscal 2024

Certification	Content	Year recognized
ISO45001	Acquiring Certification under the International Standard ISO45001 <ul style="list-style-type: none"> • An occupational safety and health management system • 12 factories worldwide have acquired this certification (50% of our 24 factories) 	2009–2024
 健康経営優良法人 ホワイト500	Certified Health and Productivity Management Organization Recognition Program – White 500 <ul style="list-style-type: none"> • Recognizes excellent companies for health management • Run by the Ministry of the Economy, Trade and Industry as well as the Nippon Kenko Kaigi (Japan Health Council) 	2017–2024
 SPORTS YELL COMPANY 2024+	Sports Yell Company 2024 <ul style="list-style-type: none"> • Recognizes companies actively working on initiatives to support and promote sports activities aimed at improving employee health • Run by the Japan Sports Agency 	2023–2024

Promotion Framework

We promote initiatives in cooperation with foreign and domestic locations, labor unions and contractors centered on the Safety and Accident Prevention Management Department, with the President as the General Manager.



Topics: Examples of Good Business Operations

Improving workplace environments based on employee proposals

At a Group factory in Thailand where natural rubber is processed and turned into rubber blocks (please refer to p. 18 for details), blocks being shipped out are loaded onto carriers.

During safety inspections in this factory, the facility's construction section raised the issue of "possible risks of severe accidents occurring, for example, falls from heights."

After checking in with workers for ideas, safety lines were suspended from the ceiling to ensure that a foot slipping off a high platform would not lead to a severe fall. The introduction of these safety lines significantly improved the work environment.

Regular safety inspections should be conducted and concerns voiced. Supervising managers have the responsibility to listen and respond appropriately to ensure zero-hazard workplace environments. We will improve on initiatives that bring the Group together to "create a safe, employee-friendly workplace" by sharing good examples of initiatives like this with other business locations.



Nurturing Safety-Oriented Human Resources

To achieve the Sumitomo Rubber Group's goal of zero severe accidents, it is essential to nurture safety-oriented human resources in parallel with creating safe environments and facilities.

To achieve this, we are creating education and systems designed to nurture safety-oriented human resources as well as to cultivate individuals' traits. Through effective communication with each workplace, we strive to nurture "safety-oriented human resources" who can speak up regardless of hierarchy.

Improving Safety Awareness

We are working to create workplaces and foster a culture of safety in which safety rules are upheld in all situations.

Item	Participants/ Relevant parties	Content
Company-wide Safety & Health and Accident Prevention Convention	<ul style="list-style-type: none"> President and Representative Director Company Directors All Executive Officers All Heads of Production Bases 	Sharing progress on targets and activities regarding safety & health/health & productivity management across the Sumitomo Rubber Group
Workplace Communication (as needed)	All production locations	<ul style="list-style-type: none"> Foremen patrol to identify hazards Engage with workers to discover issues and unsafe areas on-site

Safety Education

We are conducting regular educational activities on safety and health to bring occupational accidents to zero.

Type of education	Relevant parties	Content
Education by rank	<ul style="list-style-type: none"> New hires New foremen 	<ul style="list-style-type: none"> New hires: education regarding basic knowledge on Company safety guidelines and rules New foremen: education on guidelines for supervisors and methods to educate members as well as response measures when accidents occur
Developing risk assessment managers	Foremen/Chargehands	Educating on necessary perspectives for identifying areas where danger originates during normal workplace operations
Raising the standards of pursuing individual safety KPIs	All staff at production sites	<ul style="list-style-type: none"> Are able to objectively view their own behaviors and characteristics Are able to understand the strengths and weaknesses of managing supervisors at individual workplaces Are subject to 7-item, 5-level evaluations (target of having all staff reach at least level 3 of 5)
Specialized education	Work requiring certifications On-site employees	<ul style="list-style-type: none"> Specialized education on crane operation Specialized education on replacing grinding wheels
Danger awareness education	All staff at production sites	<ul style="list-style-type: none"> Learn to sense when there is a danger of being dragged into a roller Experience dangerous situations using VR

Building health

We believe that building "a workplace environment in which every employee can be healthy while they work" will help ensure safety. We have established "Health & Productivity Management Offices" to advance relevant initiatives.

Initiatives	Content
Mental health	<ul style="list-style-type: none"> Stress checks: Carried out by all employees, including at business sites with less than 50 people Highly stressed individuals are given a guided interview by a medical professional, and experts in industry healthcare (industrial physicians and nurses) conduct health consultations Improve workplace environments based on workplace group analysis results and feedback along with interviews at high-stress workplaces, etc. Hold mental health seminars
Measures against long working hours	<ul style="list-style-type: none"> Hold consultations regarding working conditions with employees who work more than 80 hours of overtime per month (timekeeping performed via PC login, etc.) and interviews with industrial physicians are conducted Plans for improvement formulated on the basis of interviews with management and individuals as well as the status of improvements undertaken are verified by the Human Resources Department
Support compatible with medical care	<ul style="list-style-type: none"> Accumulated leave system for supporting lifestyles Special leave system for times of poor health Provide work support in collaboration with industrial health specialists (industrial physicians and nurses) and family doctors
Measures against epidemics	<ul style="list-style-type: none"> Subsidy for influenza vaccination Support for preventive vaccination of staff assigned to overseas locations, etc.

☑ Sumitomo Rubber Group Health & Productivity Management Declaration

Raising accident prevention awareness



Since FY2007, we have conducted audits of accident prevention measures, with the goal of identifying fire risks at every business site and improving conditions. We are conducting independent audits as a global initiative.

Creating Safe Facility Environments

Improving operational environments

We continuously strive to create safe operational environments in which employees can work with confidence.

Fiscal 2024	Stepped up operational environment improvements regarding heat, noise, dust, organic solvents, etc. <ul style="list-style-type: none"> Responded based on each factory's order of priorities and respective budgets
Fiscal 2025	Actions focused on anti-heat measures <ul style="list-style-type: none"> We have secured a special budget for the President to make field visits in Fiscal 2025, and have determined the implementation of these measures to be of the highest priority across the Company

Creating spaces to share good on-site practice examples

We have a system in place to address problems that come up mid-operation that allows us to devise original solutions and propose more effective and efficient ways of working, leading to improvements. We create spaces for evaluating exceptional cases from across the Company from the perspectives of safety, quality and productivity, thereby spurring individuals to challenge themselves and grow.

Moreover, referring to examples from other workplaces can yield ideas and hints toward further improvement in a variety of areas.

Message

Ayanobu Motoue
Sustainability Management Promotion HQ
Safety and Accident Prevention Management
Department General Manager



When analyzing incidents involving occupational accidents within the Group in recent years (2023–2024), we found that around 70% of the incidents were attributable to unsafe activities prior to the incident. To best address their root causes, we strongly feel that it is necessary to take a tandem approach regarding equipment operation and activity safety. Specifically, we believe that equipment safety involves establishing a clear separation between people and active equipment backed up by sensors that automatically stop equipment when the operator is in danger. Activity safety, on the other hand, involves education that prioritizes safety in line with how tasks are approached at each job level. An example of this would be education to suppress impulses toward risky behaviors based on the individual traits of supervising managers (such as pride in their own knowledge of processes or a strong sense of responsibility).

We have continuously spread awareness of "safety first," and we are taking more specific measures to safeguard employees at all times.

Our Approach (Own Workforce): Promoting D&I Initiatives

Basic Perspective

Promoting diversity and inclusion (D&I) is at the core of respect for human rights and is indispensable for "realizing a workplace that ensures respect for diverse attributes and ways of thinking and empowers all individuals to live up to their full potential." In addition, it also prevents the occurrence of important human rights abuses, such as harassment and discrimination. We do not tolerate any form of harassment or discrimination, and we seek to foster a corporate culture that respects individual diversity.

We continuously advance initiatives that address relevant issues sincerely with an eye to building environments in which all employees can work with confidence and exercise their innate abilities to the fullest. To this end, we provide regular training, have established consultation contact points and take other steps to realize environments that facilitate a smooth work experience.

☑ D&I webpage

D&I Top Commitment

In order to live up to the ideals of "Our Philosophy," the Sumitomo Rubber Group is actively working to promote greater mutual respect among all of the diverse employees who make up our group.

The Sumitomo Rubber Group considers "uniting our diverse strengths and growing together" to be a key management challenge. With this in mind, we hereby declare the following.

Declaration on the Promotion of D&I

The Sumitomo Rubber Group respects and values the diverse attributes and perspectives of all employees. Accordingly, we are committed to creating workplaces where everyone can fully demonstrate their abilities.

- Gender, Sexual Orientation, Gender Identity, Age, Disability, etc.
- Employment Status, Situation of Hiring, etc.
- Birthplace, Nationality, Race, Ethnicity, Culture, Religion, etc.

President and Representative Director Sumitomo Rubber Industries, Ltd.
Satoru Yamamoto

S. Yamamoto

☑ Sumitomo Rubber D&I Top Commitment

Initiatives to Promote Gender Equality

By increasing the ratio of female managers, encouraging male employees to take childcare leave and other such measures, we work to promote gender equality, which is a product of social constructs and corporate culture. We are thus promoting the creation of a fair working environment in which everyone can feel motivated in their duties.

Spreading understanding and awareness

- Posting the Top Commitment
- Activities on spreading awareness of unconscious bias
- Holding seminars on stopping the harassment of men and women who take parental leave

Policies to support women in developing their careers

- Mentoring system using internal mentors
- Training for managers on educating subordinates who are female



Promoting childcare leave for male employees

Management, alongside the President, made an "Iku-Boss" (nurturing boss) declaration, committing themselves to thinking about how to become bosses who can achieve a good work-life balance for themselves and their subordinates



Activities to spread awareness at the executive level

President Yamamoto holding a discussion regarding D&I with an Outside Director and Outside Audit & Supervisory Board Members



Educational activities on International Women's Day

To raise awareness of the gender equality, an original computer wallpaper was distributed across the Sumitomo Rubber Group in conjunction with International Women's Day.

Initiatives Toward Making Production Sites Friendly to All

Future Factory Project for Better Workplaces

Looking to the future, to achieve sustainable factories at our domestic locations that will attract diverse employees, we have launched the "Future Factory Project for Better Workplaces" as a company-wide project. Through this project, we are making radical changes to factory working environments.

Striving for factories in which everyone works with enthusiasm

Within our production sites there are a number of tasks that impose a heavy physical burden on workers. We strive to create environments where work can be done with confidence regardless of gender or age. To that end, we are implementing various initiatives on factory floors.

While there is still room for improvement, on-site employees have shared positive feedback, such as "I'm happy to see visible changes" and "It's become easier to do my job." We will continue to make steady progress and further accelerate these efforts.

- Renovating and expanding welfare facilities (restrooms, changing rooms, etc.) where the number was insufficient
- Renovating restrooms to ensure they are brightly lit and safe to use during night shifts
- Improving equipment such that anyone can use it regardless of physical strength or height



On-site patrolling from a woman's perspective



A women's restroom that has been renovated to be bright and clean

LGBTQ+ Related Initiatives

Efforts to accept individuals who identify as sexual minorities help lay the foundation for embracing diversity and advancing our understanding of human rights. With the aim of creating workplaces where everyone can work as themselves, we are promoting activities that foster understanding, strengthen compliance, and increase the number of people who support such individuals (allies).

Promoting Understanding and Awareness

- Publishing an LGBTQ+ handbook
- Regular company-wide training on understanding and education
- Establishing ally communities within the Company
- LGBTQ+ training for recruitment interviewers

Creating Inclusive Environments

- Establishing internal and external consultation contact points
- Establishing a registration system for same-sex partners



As a part of our efforts to raise understanding of LGBTQ+ individuals, we display a rainbow flag at every Group site's reception desk during Pride Month* (Image is of the Tokyo Office)

* An annual event, the month of June has been designated a time of special focus on education related to respecting sexual diversity as well as on deepening understanding and support of LGBTQ+ individuals



A PRIDE-themed design of the character "Chabo" the chatbot created to communicate HR information

Initiatives for Persons with Disabilities

Sumitomo Rubber seeks to create workplace environments in which everyone can work confidently and fully utilize their skills no matter their disability.

For persons with psychological disabilities, we work with relevant organizations to ensure they are placed where they can undertake jobs suited to their needs. For persons with physical disabilities, we enhance accessibility by installing wheelchair-accessible restrooms and elevators while also adjusting the height of card readers.

While the Group's employment rate for persons with disabilities was 2.61% in fiscal 2024, exceeding the legally required rate, we will continue to improve and promote inclusive employment practices as well as create environments where everyone is empowered to fully utilize their skills regardless of disability and can realize a fulfilling work life.



Barrier-free "restrooms for all" installed (Kobe area)

Senior Employee-Related Initiatives

The Group has created a system that, since fiscal 2022, has introduced elements of a job-based HR system that clarifies performance responsibilities in order to ensure that employees are appointed to positions commensurate with their abilities. It assigns senior employees with a wealth of experience and knowledge to positions where they can utilize their skills and, by providing appropriate evaluations and remuneration, promotes the creation of workplaces that support a consistent sense of fulfillment.

Promoting D&I Understanding and Communication

With the goal of spreading understanding and fostering awareness of D&I as well as preventing harassment, we conduct regular training aimed at promoting understanding and share information. Through actions at a variety of employee levels, we seek to build a workplace where human rights are respected and diversity is embraced.

D&I-Related Training in Fiscal 2024

Date	Seminar	Content
January	Introduction to Diversity	Learning the basics of why diversity management is needed
May	Unconscious Bias Seminar	Gain a mindset to recognize and alter behaviors rooted in unconscious bias that hinder D&I.
August	LGBTQ+ Seminar	<ul style="list-style-type: none"> • Basic knowledge regarding sexual minorities • How to prevent human rights violations and harassment



External Evaluations and Certifications as of Fiscal 2024

Certification	Content	Year awarded
	L-boshi Certification (Three Stars) <ul style="list-style-type: none"> • System to recognize business operators proactively promoting women's empowerment. Business operators are recognized on three levels based on five appraisal items, namely hiring, continued employment, working hours, ratio of managers and career diversity. • Run by the Ministry of Health, Labour and Welfare 	2020–2024
	D&I Award Best Workplace <ul style="list-style-type: none"> • Award evaluating and recognizing a company or organization's initiatives promoting D&I • Run by JobRainbow, Co., Ltd. 	2023–2024
	PRIDE Index – Gold Rating <ul style="list-style-type: none"> • System to evaluate a company or organization's initiatives regarding sexual minorities such as LGBTQ+ individuals • Run by the work with Pride Association 	2022–2024

Onboarding Foreign Workers

Basic Perspective

We recognize that there are various human rights risks faced by foreign workers, such as improper collection of fees associated with hiring, forced labor and long working hours after hiring, discrimination regarding working conditions and harassment at workplaces.

As such, we collaborate with management groups centered on the human resource departments where such workers are onboarded and are striving to create environments in which trainees can live and work with confidence.

Points to remember when onboarding

- Understanding the risks faced by foreign workers
- Understanding the culture and customs of the locations where workers are dispatched from
- Providing education so workers can develop their careers after returning to their home countries

Overview of onboarding: one example

Dispatch location	Sumitomo Rubber Group Indonesia tire production base (PT Sumi Rubber Indonesia)		
Onboarding location	Sumitomo Rubber Group domestic tire production base (Fukushima Prefecture Shirakawa Factory)		
Employees	February 2024 10 employees	August 2024 10 employees	December 2024 10 employees
Period	1 year		
Type	Individual-enterprise-type technical intern training ^{*1}		

^{*1} Individual-enterprise-type technical intern training: A format whereby the head office accepts employees directly dispatched from overseas local group subsidiaries. As this involves no intermediaries, no commission fees are charged.

Initiative Contents

Before onboarding

We investigate the workplace environments trainees will be onboarded to determine if there will be any issues and work with local staff to evaluate how to prepare workplaces, cafeterias, dormitories, etc., for the new staff.

Handling languages

To avoid trouble and occupational accidents due to language barriers, we prepare bulletin boards at places where work and daily life takes place, such as workplaces and dorms, that include corresponding foreign-language materials.

After onboarding

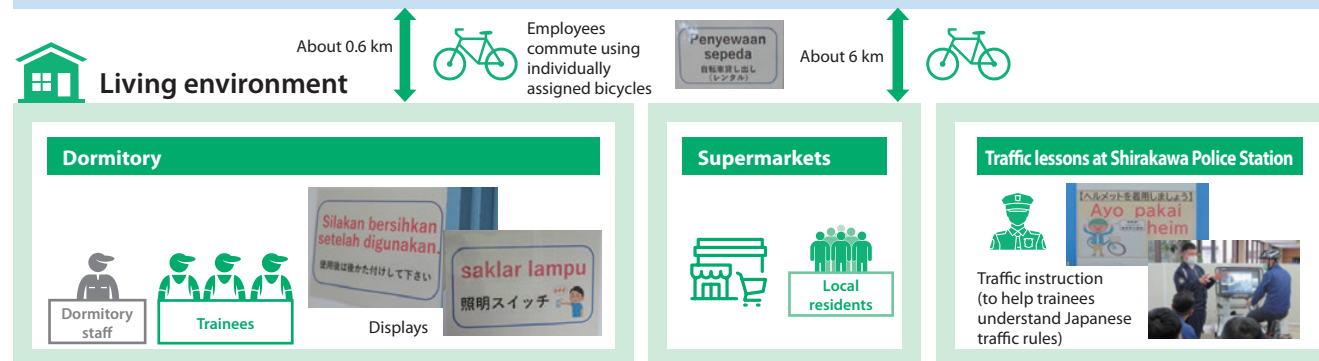
Orientation

We conduct training at workplaces where trainees will be onboarded, emphasizing safety and disaster prevention, and ensure trainees' complete understanding. We have also prepared training and opportunities for trainees to learn how to handle fire extinguishers as part of disaster prevention efforts.

Regular interviews






To understand the issues faced by trainees at work and in their daily lives, their factory's HR department conducts interviews with each trainee every two or three months.

Workplace environment (inside factories)



Topics: Assessment of Technical Trainees by Field Visit (Shirakawa Factory)

In September 2024, members of the Human Rights Subcommittee visited the Shirakawa Factory in Fukushima Prefecture, where technical trainees are assigned. Through interviews with trainees themselves and associated individuals, as well as visits to workplaces and dormitories, the members verified the type of risks that may occur from the dual perspectives of work and life in relation to the onboarding of the technical trainees.

Trainees	<p>Work</p> <ul style="list-style-type: none"> Relationships with colleagues were positive. Due to difficulties in adapting to the Japanese language, gestures and diagrams were used to facilitate communication. Much was learned about Japanese working styles, progressive automation of factory equipment and initiatives toward improving productivity. <p>Life</p> <ul style="list-style-type: none"> As Indonesia is warm year-round, some expressed concern regarding the cold in winter, but they have managed to stay healthy so far. The Company provides halal food. When eating at other locations, trainees use translation devices to check whether food is halal or not. 	
Supervisors	<p>Trainees' condition</p> <ul style="list-style-type: none"> With a passion for learning, trainees receive positive encouragement from colleagues at the workplaces where they are onboarded. <p>Points of focus</p> <ul style="list-style-type: none"> Creation of a system that immediately provides support in the event of emergency with workplace leaders and buddies. Hold more Company social events like barbeques that bring together young employees of similar ages. <p>Issues</p> <ul style="list-style-type: none"> Equipment language support is still not perfect and does not cover all processes. In reality, the changing nature of equipment specifications poses difficulties as keeping translations up to date requires the expenditure of funds and labor. 	 <p>Celebration of breaking the fast of Ramadan, known as "Lebaran" in Indonesia</p>
Trainers	<p>Trainees' condition</p> <ul style="list-style-type: none"> Trainees understand the basics of tire production, so they are fast learners and perform better than expected. <p>Points for improvement</p> <ul style="list-style-type: none"> A one-month period where trainees gain actual experience using equipment before they begin their duties should be provided (with instruction provided by highly skilled instructors who have completed their initial years of service and been rehired). 	
Dormitory staff	<p>Points of observation</p> <ul style="list-style-type: none"> Trainees live in the same employee dormitories as Japanese staff. We evaluated whether Indonesian staff face human rights risks in their daily life regarding dorm rooms, cafeterias, shared spaces, meeting rooms, shower rooms, restrooms, laundry rooms, prayer rooms, bulletin boards, etc. <p>Points for improvement</p> <ul style="list-style-type: none"> Indonesian-language signage for cafeterias as well as other common areas and evacuation routes should be provided. Responses should be flexible and take into account Indonesian culture and the needs of trainees. Examples: Halal food, prayers, shower curtains in shared bathing rooms, etc. 	 
Factory HR	<p>Points for improvement</p> <ul style="list-style-type: none"> Activities to foster understanding of local communities, workplaces, and dorms, as well as build teamwork and trust should be properly undertaken. Orderly measures taken in response to the desires and issues trainees bring up in their regular interviews. Example: providing a car to support trainees in shopping, etc., once or twice per week <p>Issues</p> <ul style="list-style-type: none"> As this was the first time trainees were onboarded from outside the country, there were more issues than expected. The insight we gained can be used again with other trainees in the future. Language support for equipment operation and document provision entails cost and labor expenditures. Because there is a limit to what can be handled within factories, discussion across the entire Group on how to continue onboarding technical intern trainees is needed. 	

After the visit

The trainees operate at a high technical level and are held in high esteem at their workplaces. Both trainees and the workplaces were able to verify that onboarding trainees is a worthwhile endeavor.

Potential issues

When bringing in foreign nationals of a different religion and culture with customs that differ from those of Japan, there is a need to respond to higher costs at domestic locations and improve workplace management for these sites, which feel a heavy responsibility regarding these trainees.

Moving forward

We will share human rights risks and issues from both before and after bringing in trainees with top management and would like to build expertise in such systems while looking at example cases from other companies and listening to the opinions of experts.

We will promote the creation of environments that make it easier to learn and work by holding interviews with technical trainees on what they are struggling with, then sharing points for improvement across the Company.

We also feel that responding to the issues faced by those in charge of training is critical to the continuation of this system.

Message

Junji Ohira
Shirakawa Factory
Factory Manager



Since 2024, we have onboarded 20 national staff from tire factories in Indonesia as technical trainees.

When doing so, we recognize that their lifestyle habits and culture are different from our own. This means that we must not only prepare physically, such as by providing prayer rooms and halal food for them, handling translation on-site and permanently stationing interpreters, but also promote non-physical accommodations through education. This includes training activities on furthering mutual understanding across differing cultures.

This year-long program finished at the end of January 2025, and 10 technical trainees (Group 1) returned to Indonesia. Drawing on their experience in Japanese manufacturing, we expect they will be able to further expand the ways in which they participate as national staff at the factories there.

Our Approach (Value Chain): Entire Value Chain

Basic Perspective

In dialogue with our business partners, we put the importance of sustainable measures to the forefront and promote mutual understanding by deepening our communications.

By also pursuing collaboration and mutual benefits with our business partners, we seek to realize sustainable procurement and build new partnerships.

Formulating the Procurement Guidelines

With the goal of ensuring sustainable procurement, the Group released the 8th edition of our Procurement Guidelines in July 2024.

These guidelines outline laws and regulations related to human rights in all countries and regions while also requesting the exercise of respect for human rights.

We also request our business partners to share these guidelines with suppliers, and, as of January 31, 2025, we have received letters of acceptance of these guidelines from around 90% of our business partners who handle materials for tires.

☑ Procurement Guidelines 8th Edition [Raw materials for tires] (Japanese version)

☑ Other languages (English, Chinese, Portuguese, Indonesian, Thai)

Verifying the Status of Initiatives Regarding Sustainability Issues

Utilizing a third-party evaluation agency (EcoVadis)

We are monitoring and evaluating the performance of human rights, governance, and environment-related initiatives within our supply chain.

Target	Business partners handling materials for tires (including new business partners)
Assessment items	Quantitative indicators of sustainability-related initiatives around the four axes of "Environment," "Labor and Human Rights," "Ethics," and "Sustainable Material Procurement"
Utilizing evaluation results	We communicate with individual business partners and request that they to improve their activities if the results of evaluations are below a certain standard

Results of Fiscal 2024 Initiatives

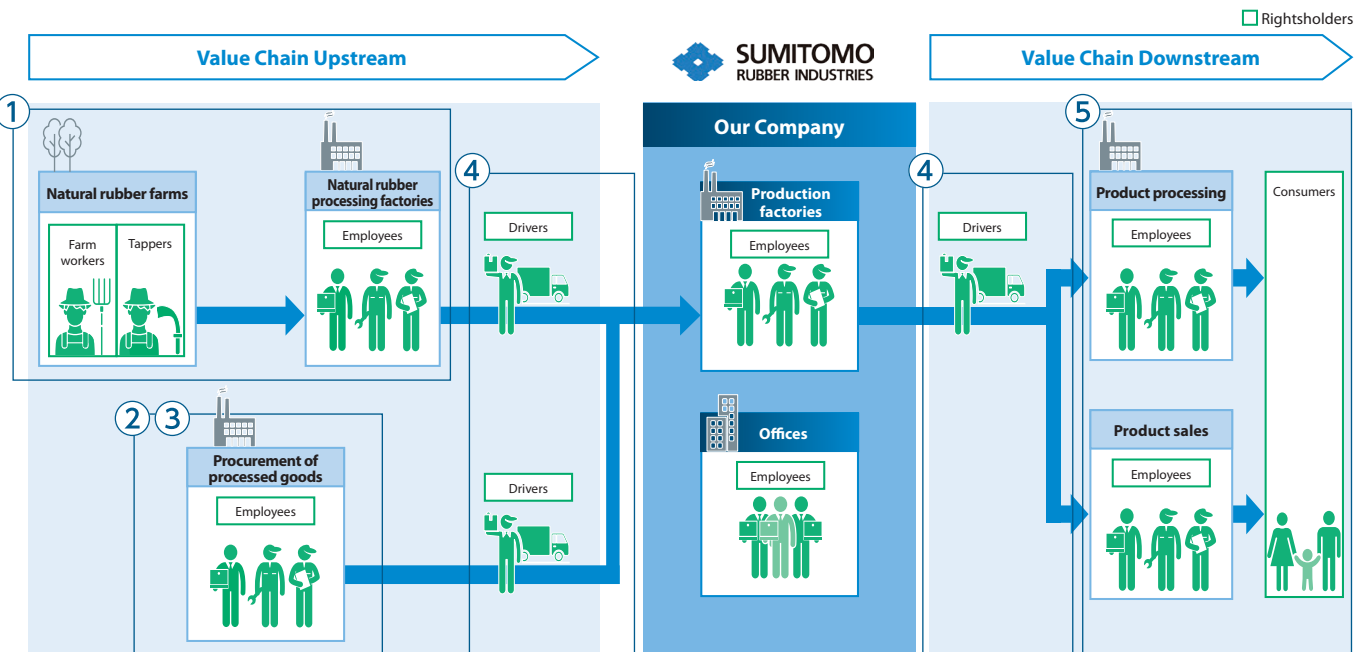
We achieved our goal of using 95% of our purchasing funds to procure materials from suppliers who scored higher than the standard 45 points on evaluations.

☑ Achieving sustainable procurement goals for tire materials (Japanese only)

HRDD Initiative Policies

Because the impact and severity of human rights risks regarding 1) natural rubber and 2) tire material suppliers are high in the following diagram, these are being prioritized.

We have also created an order of priority for 3) sports and manufactured goods suppliers, 4) logistics-related organizations, and 5) organizations downstream on the value chain, and are following this order when advancing our initiatives.



In fiscal 2024, we focused our HRDD on "Value Chain Upstream," where the potential severity of human rights risk was high.

1) Natural rubber	<ul style="list-style-type: none"> • We have identified natural rubber as an extremely critical, high-risk material in our supply chain, and actively pursue aligned initiatives with the highest priority • We conducted field visits to assess natural rubber farms and processing factories in Thailand in fiscal 2024 (pp. 17–18) • We will collaborate with a procurement company in Singapore (p. 17) in fiscal 2025 and beyond, and will create a HRDD strategic target
2) Tire material suppliers	This is the largest of our three businesses and is being prioritized
3) Suppliers related to sports and manufactured goods	Many are medium- to small-scale businesses, and we are continuing to determine priority based on our understanding of the status of each business partner
4) Logistics-related businesses	Strategies regarding these areas will be set in fiscal 2025 and beyond
5) Value chain downstream	

Our Approach (Value Chain): Natural Rubber

Basic Perspective

Sustainable Natural Rubber Policy

To facilitate all parties in our supply chain realizing the sustainable procurement of natural rubber, the Group published the Sustainable Natural Rubber Policy in 2018.

In 2021, we incorporated the contents of the GPSNR^{*1} Policy Framework into the Sumitomo Rubber Group Sustainable Natural Rubber (SNR) Policy to further promote initiatives related to environmental issues stemming from forest destruction in regions where natural rubber is produced as well as initiatives related to human rights issues in work environments.

^{*1} Global Platform for Sustainable Natural Rubber

☑ Sustainable Natural Rubber Policy (English)

Points of note

- Pursue ongoing coexistence with nature through eco-friendly activities
- Protect the rights of farm workers and improve working conditions
- Support and protect the rights of indigenous peoples and local communities
- Visualize environmental and human rights risks while working to mitigate risks
- Support greater productivity by disseminating information on effective farming practices

Risks in the Natural Rubber Supply Chain

Ensuring traceability

The natural rubber supply chain is very complex, consisting of a wide array of stakeholders, including around 6 million small-scale farms, plantations, dealers, and factories worldwide. The difficulty faced in assessing the actual state of human rights risks in the industry is a major issue.

Supporting small-scale farms

Around 85% of natural rubber producers are small-scale farms. Farthest upstream in the supply chain, small-scale farmers face such human rights risks as low wages and harsh working conditions. To reduce these risks, a steady source of income is needed, and support for establishing sustainable production practices, etc., is essential.

Initiatives at Natural Rubber Procurement Companies

To support its efforts to ensure the stable procurement of quality natural rubber, the Group established Sumitomo Rubber Singapore—a natural rubber procurement company—in Singapore, the world's largest natural rubber market. This is an important location for promoting the Group's SNR^{*2} activities, and operations commenced here in April 2020. Sumitomo Rubber Singapore actively works on human rights and environmental issues regarding SNR procurement.

^{*2} Sustainable Natural Rubber

Initiatives from the Human Rights Subcommittee

Natural rubber farms are a hotspot^{*3} for human rights risks.

Because evaluation sheets and interviews are not always sufficient to gain a proper understanding of conditions faced by farm workers regarding workstyles and workplace environments as well as effects on residents in the area, the Company conducts field visits.

In addition, in our dialogues with rightsholders as well as those responsible for overseeing on-site locations and human rights officers, we try to approach the situation from the perspective not of identifying problems but identifying what we need to do to achieve a better way of working.

^{*3} ☑ "Reference Material on Practical Approaches for Business Enterprises to Respect Human Rights in Responsible Supply Chains" (b) Human rights issues by product (covering forced labour and child labour)

Selecting locations for visits

Perspective 1)	Relationship with our Company^{*4} Visits to sites where it is possible for the Company to "cause" or "contribute to" human rights risks
Perspective 2)	Style of farm management Because there is the possibility of differences between managed farms and self-operated farms, both are visited
Perspective 3)	Farm scale Because there is a possibility of conditions differing based on a farm's scale, amount harvested, etc., farms of differing scales are visited

^{*4} ☑ Ministry of Economy, Trade and Industry's "Guidelines on Respecting Human Rights in Responsible Supply Chains" pp. 17–18

☑ Report on Research on Business and Human Rights: How Companies Should Respond to the Issues of Business and Human Rights Today p. 62(3) (Japanese only)

Main initiatives

- ☑ Initiatives toward improving quality of life on natural rubber farms (Japanese only)
- ☑ Initiatives toward improving transparency and sustainability in the natural rubber supply chain
- ☑ Implementing "RubberWay[®]," a risk assessment tool specific to natural rubber
- ☑ Providing funding support programs to improve earnings of small-scale farms as well as farm technology (GPSNR Project)

Fiscal 2024 Visit Location: Thailand (p. 19)

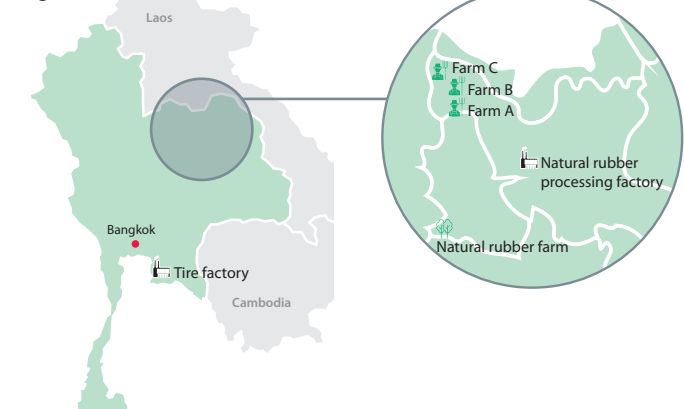
1: Natural rubber processing factories and managed farms

	Natural rubber processing factory	Natural rubber farm
Location	Sumirubber Thai Eastern Corporation Co., Ltd.	Sumirubber Thai Eastern Plantation Co., Ltd.
Region	Udon Thani Province, Thailand	Nong Bua Lam Phu Province, Thailand
Relation to the Company	Group company	Joint venture

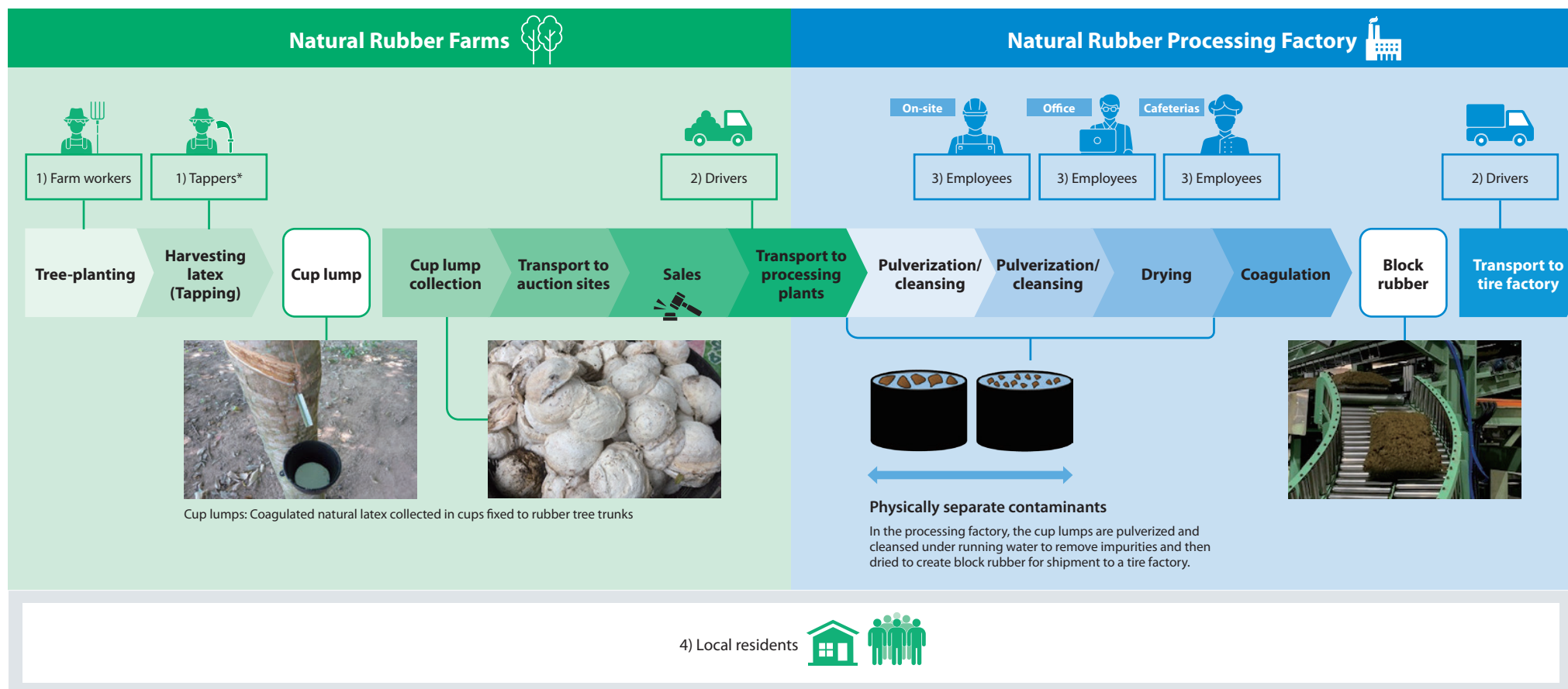
2: Self-operated farm

Farm scale	Large	Medium	Small
Farm	A	B	C
Year planted	2005	2004	2004
Area (ha)	Approx. 7.5	Approx. 4.0	Approx. 2.0

Kingdom of Thailand



Value Chain Risk Map (Natural rubber)



Rightsholders	Expected risks
1) Farm operators, tappers	<ul style="list-style-type: none"> Forced labor/child labor Hazardous/unsafe working environments Significant drop in earnings caused by a market decline (resulting in wages insufficient for basic living needs)
2) Drivers	<ul style="list-style-type: none"> Hazardous/unsafe working environments Imposition of longer working hours via abrupt schedule changes

* Tapper: On-site workers responsible for harvesting latex from rubber trees

Rightsholders	Expected risks
3) Employees	<ul style="list-style-type: none"> Hazardous/unsafe working environments Imposition of longer working hours via abrupt schedule changes
4) Local residents	<ul style="list-style-type: none"> Forced relocation (violations of land rights) Oppression of indigenous groups Exhaustion of water resources Pollution of water or land

Topics: Field Visit to Assess Natural Rubber Farms and Processing Factories (Thailand)

In October 2024, members from the Company's Human Rights Subcommittee accompanied specialists in human rights on field visits, mainly to natural rubber processing factories and rubber farms (4 locations).

The members observed operations and obtained hands-on experience of the tapping process used in collecting the resin that is processed into natural rubber. In addition, farm workers and related individuals were interviewed. Through such visits to natural rubber farms and research locations, the members are able to gain a better understanding of working conditions as well as to verify the potential of risks to both the environment and human rights materializing.

Farm workers (tappers)	<p>Working environment (appeal of work)</p> <ul style="list-style-type: none"> Natural rubber is harvested at night, making working conditions cooler than those experienced when harvesting such other tropical crops as sugarcane and cassava. Farm management is unnecessary and income is good, as the work required for natural rubber harvests consists only of tapping trees and delivering cup lumps. Unlike working in a factory, harvesting natural rubber can be done at one's own pace, which is a point of appeal. (Sugarcane and cassava are harvested in the off-season, and natural rubber provides additional income for many) <p>Points of caution</p> <ul style="list-style-type: none"> Snakes and scorpions present a hazard as they come out at night, and care must be taken to avoid injury from wind-blown branches 	 <p>A meeting with tappers</p>
Farm managers	<p>Point of concern #1: Securing human resources</p> <ul style="list-style-type: none"> To this point, word of mouth, supported by our efforts to build good relationships with our current tappers, has allowed us to secure human resources. It is projected that issues securing human resources will present themselves due to current tappers becoming older, a reduced working population in Thailand, etc. <p>Reference: Trends in securing human resources for natural rubber farms</p> <ul style="list-style-type: none"> Thailand (Rayong area): There is already a growing trend toward workforce insufficiency. Currently, many workers are being hired from Cambodia and Laos. Laos: It has been seven years since farmers began planting natural rubber trees in Laos, so the possibility of such plantations providing work in that country has grown. As a result, fewer people may travel to Thailand for work. <p>Point of concern #2: Amount harvested</p> <ul style="list-style-type: none"> There are currently areas where natural rubber trees have withered, and harvests are not guaranteed. This will be handled through replanting and similar measures. Research is being done on revitalizing soil through the use of compost and chemical fertilizers <p>Point of concern #3: Theft</p> <ul style="list-style-type: none"> Thefts of cup lump inventories have occurred (stolen cup lumps can yield solid profits) Measures such as night patrols and security cameras are needed to stop theft, and management needs to spend more time addressing the issue. 	 <p>Hands-on tapping</p>
Self-managed farmers	<p>Working environment</p> <ul style="list-style-type: none"> The ground is more uneven than in managed farms, which have flat areas where rubber trees are planted in tidy rows. <p>Point of concern #1: Securing human resources</p> <ul style="list-style-type: none"> Currently management is undertaken smoothly by rotating families and relatives, and there is no sense of labor shortages or a need to hire foreign nationals. —There is a possibility that the most recent data on labor populations is insufficient, and there is a need to continuously work to understand conditions. <p>Point of concern #2: Value of natural rubber</p> <ul style="list-style-type: none"> Verification of value trends at other auction houses is done online, and farmers are exploring ways to maximize profits, such as directly selling wholesale without using an intermediary agent. 	 <p>Small-scale farm auction house</p>
Researchers on location	<p>Point: Increasing natural rubber yield using chemical products</p> <ul style="list-style-type: none"> We are discussing the use of ethylene stimulation, which can reduce the frequency of tapping while increasing the yield of a single harvest. <p>Concern: Natural rubber quality</p> <ul style="list-style-type: none"> Verification must be done on whether the use of ethylene stimulation has an impact on the quality of natural rubber. <p>Note: Joint research undertaken with Thailand's Khon Kaen University</p>	 <p>Field visit to an R&D site</p>

After the visit

Potential issues

We were able to gather a large quantity of data through dialogue with natural rubber farms and by directly confirming working environment conditions. Specific human rights risks were recognized, such as the burden of working at night and income fluctuation due to the unreliability of yields. The shrinking farm labor population in Thailand presents a future concern. We realized the necessity of continuing technological research and support to lower the risks these circumstances pose.

Moving forward

This field visit covered four locations in northeastern Thailand and, because risks vary across countries and regions, we plan to continue such visits. While stepping up our collaboration with external partners, we will continue to promote human rights due diligence at natural rubber farms.

Message

Hiromi Murakami
Sumirubber Thai Eastern Corporation (STEC)
Factory Manager



STEC, a natural rubber production company owned by Sumitomo Rubber, is celebrating its 15th year of operations. That we have been able to continue to develop thus far is thanks to the provision of raw materials from Thailand's northeastern region by farmers and dealers. We will be working together in a major capacity with farmers once the EUDR* comes into effect, which is expected to happen after 2026. We will continue to strive to develop our rubber processing capabilities in Thailand and share information.

From an environmental standpoint, we are responding to the desires of local residents by establishing measures to prevent issues stemming from foul odors and wastewater and are working to improve our capacity to gather information via new technologies.

For factory working environments, we are conducting improvements related to the handling of heavy goods, are installing air conditioners, and are continuing to otherwise build environments that are easy to work in.

* EUDR: EU Regulation on Deforestation-free products

Evaluating Effectiveness

Basic Perspective

In our initiatives regarding business and respect for human rights, spreading awareness of the Human Rights Policy and establishing grievance mechanisms are actions required at all locations, regardless of the degree of human rights risk.

In fiscal 2024, we verified the status of awareness levels with respect to these two points at all Group locations.

In addition, regarding important human rights issues being prioritized by the Company (p. 9), focus is being placed on production bases, where it is expected that the severity of human rights risks is particularly high, and we monitor the status of implementing initiatives.

In fiscal 2025, we plan to also confirm implementation status at sales locations.

Awareness of the Human Rights Policy

During fiscal 2024's Corporate Ethics Month, we shared such internal official notices as a message from President Yamamoto and held further readings of the Human Rights Policy. We also spread information on the importance of respecting laws and corporate ethics, with each department head and the presidents of subsidiaries undertaking to communicate this to their employees.

We were thus able to ensure the completion of this initiative at all foreign and domestic locations.

	Sites implemented/ total number of sites	Number of employees
Sumitomo Rubber non-consolidated bases	118/118	Approx. 8,000
Tire Business/Other affiliated companies	36/36	Approx. 27,000
Sports Business affiliated companies	18/18	Approx. 2,400
Industrial Products Business affiliated companies	7/7	Approx. 2,000
Total	179/179	Approx. 39,400

Status of establishing grievance mechanisms^{*1}

It was found that some subsidiaries' efforts to establish grievance mechanisms were inadequate.
(Lack of grievance mechanisms that employees could use in their native language, lack of awareness regarding grievance mechanisms, etc.)

^{*1} In addition to the Sumitomo Rubber Group's shared Corporate Ethics Helpline (p. 22), this indicates individual grievance mechanisms at worksites

	Fully established	Not yet established
Internal help desks	33 companies	9 companies
External help desks	34 companies	8 companies

Note: Survey target: subsidiaries (42 companies)

Implementation status of important human rights issues (p. 9)

It was confirmed that there is a need for shared recognition of respect for human rights after taking into account disparities in understanding regarding human rights within each business division and country.

Evaluation overview

	Evaluation method	Evaluation content
1	Questionnaires	Confirmation via questionnaires on whether help desks exist (internal and external) and the awareness levels regarding them
2	Online interviews	Confirmation of details for individual locations based on the above questionnaires
3	On-site inspections	Persons in charge of human rights visited four overseas locations and four domestic production factories to hold dialogues and inspect the status of initiatives at sites (pp. 15, 19)

Status of establishing regulations^{*2}

	Established	Parts not yet established
Work safety	15 companies	4 companies
Harassment	13 companies	6 companies
Prohibition of discrimination and equality under law	9 companies	10 companies
Foreign national workers	Evaluations planned	
Forced labor	19 companies	—
Child labor	19 companies	—

^{*2} Targets for fiscal 2024 evaluation: Head Office and subsidiaries (19 production bases). Includes SRUSA (Sumitomo Rubber USA, LCC), which was divested in late 2024

Executive-level review and future policy on initiatives

In addition to the results confirmed above, executives have received feedback from human rights specialists and have aligned future initiatives with international human rights trends to decide their direction.

Item	Review content	Direction of future initiatives
1 Human Rights Policy	Fostering awareness of compliance across the Group is important to initiatives made in the Corporate Ethics Month	By spreading awareness of the Human Rights Policy at all locations over the next year and beyond, the Company seeks to complete this process via continued education and activities to spread awareness
2 Grievance mechanisms	There is a need to proceed with establishing grievance mechanisms at locations that do not yet have them, which the Human Rights Subcommittee and other locations will work together to accomplish	Establishing grievance mechanisms that employees at overseas locations can use in their native language is of notable priority
3 Important human rights issues	<ul style="list-style-type: none"> Many matters first come to light via dialogues and on-site inspections, highlighting that it is important to begin by knowing that an issue exists It is desirable that every business division understands human rights risks when undertaking business operations Given the burden upon related divisions, locations and suppliers, we are considering the possibility of more effectively utilizing existing audit methods, etc. 	<ul style="list-style-type: none"> Continued information sharing from the perspective of human rights, creating a space for understanding Creating systems and methods to prevent adverse human rights impacts at each business department Reorganizing existing measures to evaluate the possibility of reflecting elements of HRDD

Strategic Targets of Initiatives

Basic Perspective

The Company has developed a wide array of businesses, including the Tire, Sports, and Industrial Products businesses, and works with diverse suppliers. Traceability is especially difficult regarding natural rubber in the supply chain, which is a human rights hotspot.

To respond to this, we have set HRDD priorities among three categories as follows.

Priority #1

- Head Office in Japan
- Group production bases
- Value chain upstream (natural rubber/tires)

Priority #2

- Value chain upstream (sports/industrial products)

Priority #3

- Group sales locations
- Value chain downstream

Strategic Targets

The EU's Corporate Sustainability Due Diligence Directive (CSDDD*) came into effect in 2024. Parties to whom this directive is relevant include corporations operating within the EU and those whose operations affect the EU market, a scope in which the Company falls.

We plan to complete preparations for annual information disclosures by the end of 2028. To this end, we have created a roadmap that lays out an order of priority regarding matters to be addressed before the end of 2027. We are continuing to promote HRDD initiatives based on this.

* CSDDD: Laws placing responsibility for transparent reports on the proper management of environmental and social risks that can occur within a corporation or its supply chain

Roadmap

				2024	2025	2026	2027
Head Office	1) Establishing frameworks						
	2) Risk assessments						
	3) Risk mitigation						
	Policy awareness						
	Help desk awareness						
	Establish grievance mechanisms						
Subsidiaries	4) Confirm Progress						
	Production bases	Direct hiring	Enacting items 1–4 in the same manner as the Head Office				
		Indirect hiring	HRDD for foreign workers				
	Sales locations						
Value chain (upstream)	Origin (natural rubber)						
	Suppliers (direct contracts)						
	Suppliers (indirect contracts)						
Value chain (downstream)	Logistics companies						
	Product sales companies						

■ Priority #1 ■ Priority #2 ■ Priority #3

Priority Initiatives in Fiscal 2025

Item	Content	Method
Establishing systems	• Examinations of how to apply HRDD activities into existing operations at each location and business division	Collaboration with related divisions led by the Human Rights Subcommittee
Human Rights Policy	• Ongoing education and activities regarding awareness of the Policy at all locations during next year and beyond	Seminars, individual study sessions, etc.
Help desks	• Finish establishment at all Group locations • Evaluate multilingual measures	Collaboration between the Corporate Ethics Committee as secretariat with each business and administrative department
HRDD (Group production bases)	• Continued promotion of HRDD at each location • Make knowledge regarding methods for onboarding technical trainees explicit • Risk assessments of foreign workers (indirect hires)	• Progress checks through discussions, business trips, etc. • Express methods for onboarding technical trainees based on insights from workplaces and supervising organizations. • Receive support from outside specialists (the International Organization for Migration (IOM))
HRDD (natural rubber)	• Continue promoting HRDD • Examine how to incorporate into existing operations	• Field visits for Indonesian rubber farms • Collaborate with SUMITOMO RUBBER SINGAPORE PTE. LTD.
HRDD (value chain upstream)	• Promote strategic HRDD proposals among tire-related suppliers • Create strategic HRDD proposals among sports and industrial goods producers	Collaborate with procurers and every business division

Establishing Grievance Mechanisms

Basic Perspective

The Sumitomo Rubber Group has established a Corporate Ethics Helpline as a point of contact for collecting information and handling inquiries related to violations of laws and corporate ethics, including human rights violations.

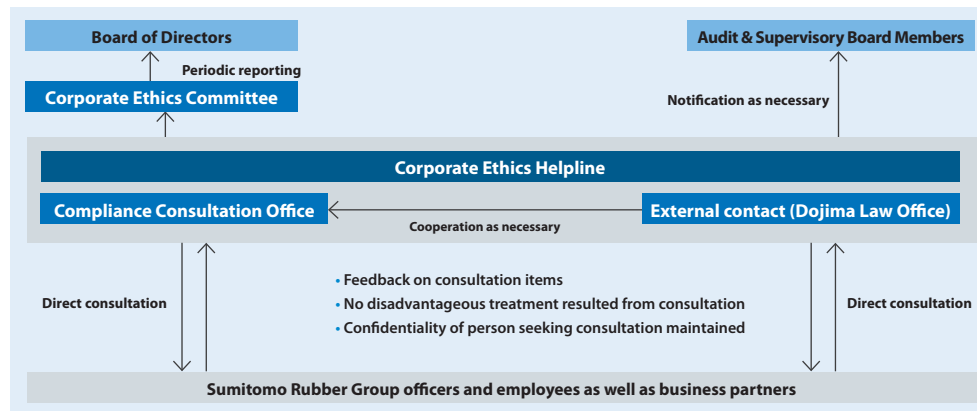
To raise awareness of alternative reporting methods beyond the normal chain of command, we provide all employees with compliance cards that include contact information for submitting reports.

☑ Compliance

Promotion System

We have established the Compliance Consultation Office as a Corporate Ethics Helpline (consultation contact point) operating directly under the President. If a problem is identified within our Group, we take thorough care to ensure that employees who come forward are protected from any disadvantageous treatment. The Corporate Ethics Committee leads investigations into the facts, and for human rights-related concerns, works in coordination with the Human Rights Subcommittee toward resolving issues.

In addition, we pay close attention to legal compliance, seeking advice from our corporate attorneys as necessary.



Details of Initiatives

Following the establishment of the Human Rights Subcommittee in 2024, we reviewed our existing Corporate Ethics Helpline to assess its alignment with the UN Guiding Principles on Business and Human Rights, and identified the status of and issues with grievance mechanisms across all domestic and international business locations.

Where current practices fall short of the guidelines' requirements, we will take steps to review and improve them.

Issues with the Existing Grievance Mechanisms

U.N. Guidelines	Issues with the Company's Corporate Ethics Helpline
Accessibility	Utilizing Sumitomo Rubber's Corporate Ethics Helpline is difficult for some overseas subsidiaries due to language barriers (consultation is available only in Japanese and English)
Built on a foundation of engagement and dialogue	No reports have been filed at some overseas subsidiaries, indicating the need to verify the efficacy of the Corporate Ethics Helpline.



Approach to addressing issues

We aim to better understand and improve the state of reporting hotlines at overseas locations (ensuring that improvement plans are finalized across all locations after assessing their current status)

We plan to set up reporting hotlines for all overseas employees in their native languages by the end of 2025 and make said hotlines available company-wide from January 2026 or establish a plan to do so.

Topics

Take aways from visits to natural rubber farms in Thailand

In October 2024, members of the Human Rights Subcommittee conducted a field visit to a rubber plantation in Thailand and verified that the grievance mechanism was well understood.

A commitment to hearing unspoken concerns that may not surface through the help desk

Through dialogue with rubber farm workers and a field visit, it was observed that problems and concerns held by workers are mainly reported to the village mayor who oversees the farm. This suggests that the grievance mechanisms have not yet taken root as a channel for directly reporting to the Head Office or the natural rubber processing factory that receives the rubber.

While establishing grievance mechanisms is crucial, we recognized this alone is insufficient. Direct visits to plantations, on-site assessments, and proactive listening to workers' concerns all proved equally essential.

The importance of creating grievance mechanisms that align with real-world circumstances

We will continue to regularly visit farms and surrounding areas to understand on-site conditions and listen directly to local concerns. In addition, these findings will directly assist us in improving our grievance mechanism's framework.



A Group employee introducing a Thai-language help desk notice at an auction venue

Stakeholder Engagement

Basic Perspective

The Company believes that engaging in dialogue with stakeholders, particularly rightsholders, is essential to enhancing awareness and risk sensitivity regarding human rights, as well as to improve the effectiveness of our human rights initiatives. Accordingly, opinions and information obtained through such dialogue are used to evaluate and revise our initiatives.

Since the establishment of the Human Rights Subcommittee in fiscal 2024, we have proactively created opportunities for dialogue with stakeholders, including customers, shareholders and investors, employees, business partners, human rights specialists and those in charge of human rights at other companies. As a result, we have gained greater insight into the policies and responses of Group companies and other companies as well as stakeholder expectations and demands. By deepening our mutual understanding, we have reaffirmed the importance of forming business partnerships and working together to address human rights issues.

We will continue fostering dialogue and collaborating with stakeholders to drive effective human rights initiatives.

☑ Stakeholder Engagement

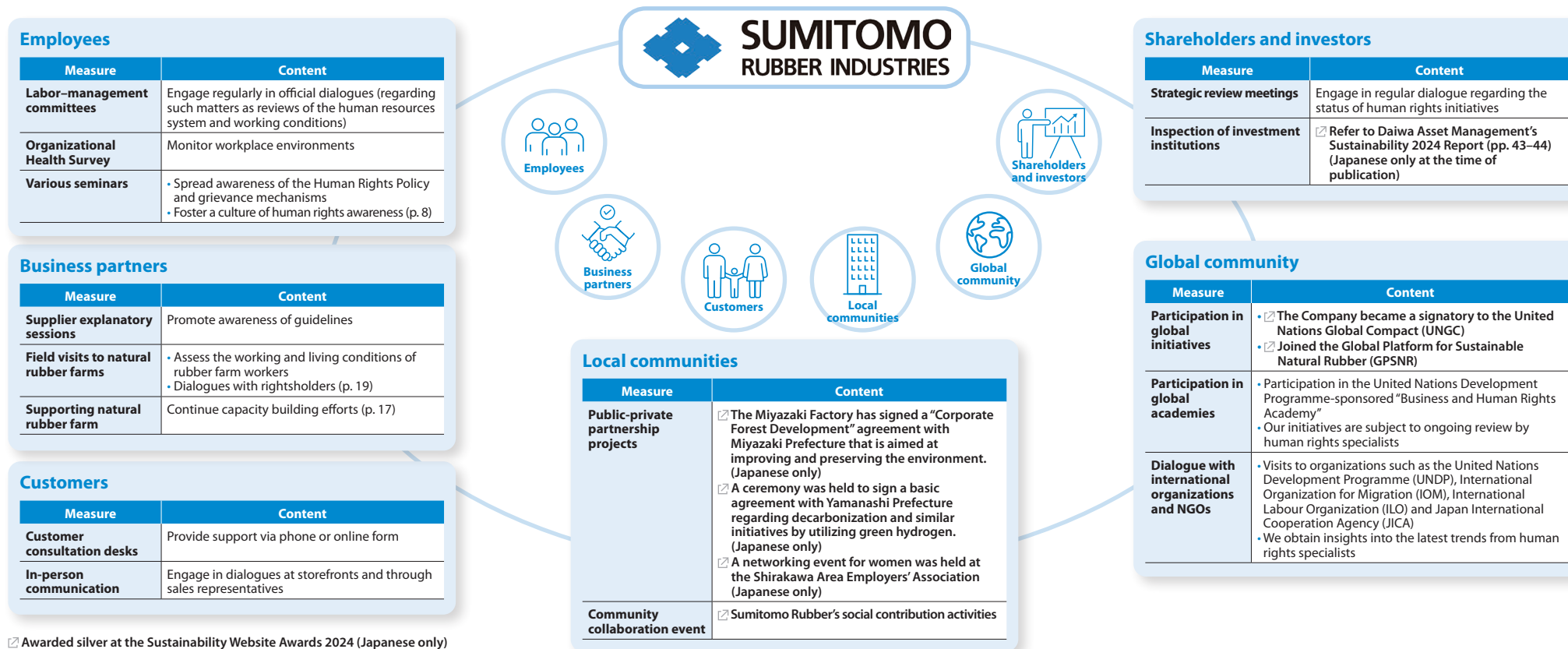
Reference information

Relationship between stakeholders and rightsholders

Stakeholders: All parties involved in or affected by our business activities, including customers, shareholders and investors, employees, business partners, local communities, etc.

Rightsholders: Individuals or groups whose human rights are affected by or may be affected by our business activities

Key Dialogue Topics



Moving Forward (Expert Review)



Attorney At Law, Kotonoha Law;
United Nations Development
Programme (UNDP) Business and
Human Rights Project Liaison Officer

Ms. Akiko Sato

History

I provide advice regarding business and human rights in such instances as human rights policies and human rights risk assessments for Japanese corporations as well as in coordinating stakeholder engagement with NGOs in Asia and Japanese corporations. I am focused on improving the formulation and practical implementation of internal company frameworks regarding the facilitation of HRDD.

I joined the UNDP as a Liaison Officer for the Business and Human Rights project. I handle training and other such efforts regarding HRDD for Japanese companies, suppliers and business partners at the Business and Human Rights Academy.

I received an LLB from the Sophia University Faculty of Law Department of International Legal Studies and then received a JD from the Hitotsubashi University Graduate School of Law. I also hold an MA in Development Studies with a major in Human Rights from the International Institute of Social Studies (The Hague, the Netherlands).

On the Inaugural Human Rights Report

The report conveys a clear and determined commitment to further promoting HRDD. Essential to demonstrating this commitment is a management system that focuses on human rights concerns at the executive level.

The report encompasses human rights risks across the value chain, clarifies the Company's relationships with a diverse range of rightsholders and provides the rationale behind the identification of important human rights issues. It also provides specific examples of actions taken to address individual issues related to the gender gap and safety, making it useful for spreading awareness of human rights risks. Furthermore, the report incorporates a roadmap for the future that serves as a form of communication, helping to ensure accountability in line with the Guiding Principles.

The Importance of Continuous Engagement

With a particular focus on natural rubber farms and factories as well as inspections of locations onboarding foreign national workers, disclosures of conditions and insights gained through on-site visits help deepen collaboration at on-site locations and other divisions that handle environmental issues and climate change. Fully aware of the fact that human rights risks cannot be entirely eliminated, continuous engagement with those that are most in danger of impact is paramount to efforts toward minimizing such impacts. This is also

connected to improving the efficacy of grievance mechanisms and support systems.

It is therefore vital that the Company strive to deepen its knowledge regarding business and human rights across the organization, constantly reappraise initiatives at each department from the perspective of human rights, and actively listen to people and communities in vulnerable positions. Moreover, because there is seldom one definitive solution to an issue, it is possible to create more meaningful human rights initiatives by learning through dialogue.

Moving Forward

It is important to respond to the "rules," i.e., the laws and regulations, of individual countries. However, amid growing global instability due to climate change and conflicts, ensuring firm core values and principles is necessary for corporations striving to fulfill their responsibilities to society no matter the circumstances.

From the dual perspective of ensuring sound business and upholding human rights, we go beyond respect for laws and regulations to utilize international human rights frameworks to promote a code of conduct that facilitates the realization of responsible business activities and brings attaining a sustainable society closer. I expect the Company to continue to utilize efficacy evaluations and engage with internal and external rightsholders as a base for steady progress in implementing highly impactful measures aimed at preventing and mitigating human rights risks.

Third-Party Remarks

We would like to express our gratitude to Ms. Sato for her advice regarding the Group's human rights initiatives.

Taking into account the changes to the Group's business environment, we reappraised our material issues (key issues) in 2024. Through such efforts, we not only seek business continuity, but also strongly reaffirm our commitment to carrying out our responsibility to respect human rights and coexist with society as we promote HRDD. These initiatives have now been compiled in this Human Rights Report.

As we promote HRDD, the many social issues and social changes tied to human rights-related issues, such as changes in the international situation, climate change, population trends and the development of an information-oriented society, have become more complicated and diverse, and we feel that solutions to them will not come easily. For example, our inspections of rubber farms and dialogue with small-scale farmers increased our awareness of the reciprocal nature of the relationships between levels of farming knowledge and technology, information gathering capabilities, community support (education/consultation), sources of income and income levels, all of which are known to be connected to human rights risks. Regarding the establishment of a grievance mechanism, we are keenly aware of the difficulties present in the absence of a uniform and highly effective approach. We are at just the beginning stage of a continuous journey toward improvement.

The Group will continue its efforts to overcome issues and be a Company that respects the human rights of all people affected by its operations. To this end, we will continue to strive toward creating peace of mind and happiness for future generations.



Sumitomo Rubber Industries, Ltd.
Sustainability Promotion Department Head

Yukino Miyagi

Metrics (Social Data)

*Data is for Sumitomo Rubber Industries (non-consolidated), unless stated otherwise.

Key themes	Metrics	Unit	Fiscal 2023	Fiscal 2024	Notes
			Results	Results	
Health and safety	Sick leave rate	%	0.93	0.85	
	Occupational injury frequency rate	%	0.07	0.13	
Coexistence with regional communities	Total amount of Sumitomo Rubber Industries CSR Fund subsidy	Millions of yen	12.43	13.90	We launched the Sumitomo Rubber Industries CSR Fund in 2010 to support neighboring regional societies and pursue harmonious coexistence through employee fundraising
Basic information	Number of employees (consolidated basis)	Persons	39,975	37,995	As of December 31, 2024
	Number of employees (non-consolidated basis)	Persons	7,705	7,636	As of December 31, 2024
	Number of overseas employees	Persons	27,949	25,988	As of December 31, 2024
	Average years of service (all employees)	Years	14.1	14.6	
	Women	Years	11.7	10.7	
	Men	Years	15.2	14.7	
	Average age (all employees)	Years old	40.2	40.8	
	Women	Years old	41.0	40.3	
	Men	Years old	40.6	40.0	
	Retirement rate	%	2.6	2.3	Does not include those who retired at the mandatory retirement age
Diverse workstyles Job satisfaction Human resource development	Monthly average total working hours per employee	Hours	164.6	163.5	
	Monthly average overtime hours per employee	Hours	23.4	22.7	
	Number of annual paid leave days taken	%	86.7	86.8	
	Monthly average training hours per employee	Hours	7.72	9.70	
	Gaps between average wages paid to men and women (all employees)	%	71.9	72.3	Women's wages as a proportion of men's wages, with men's wages set at 100
	Full-time employees	%	73.6	75.2	
	Non-full-time employees	%	67.6	65.8	Since the figures include part-time workers and industrial physicians, these figures also reflect wage differences due to contracted working hours and job type.
	Childcare leave usage rate	%	—	—	Ratio of employees who took childcare leave (including those who took leave under the Company's own system)
	Maternity leave usage rate	%	100.0	100.0	
	Paternity leave usage rate	%	84.7	105.5	Since employees whose spouses gave birth in the previous fiscal year may take childcare leave in the current fiscal year, the usage rate may exceed 100%.
	Results of job transitions that contribute to career advancement	Persons	131	32	
	Results of job transfers via the Career Matching System	Cases	14	20	
Advancing diversity	Ratio of women to the total number of full-time employees	%	11.3	11.8	
	Ratio of women to the total number of career-track employees	%	13.3	14.7	
	Ratio of women to the total number of non-career-track employees	%	76.9	77.6	
	Ratio of women to the total number of skilled workers	%	2.7	3.1	
	Ratio of women among Directors	%	12.5	17.6	
	Ratio of women to the total number of managers	%	4.3	5.0	
	Ratio of women to the total number of non-full-time employees	%	19.3	19.4	
	Ratio of women to the total number of new employees	%	17.4	31.8	Ratio of women among new full-time employees (excluding skilled workers at all factories)
	New university graduate hires	%	12.5	24.4	
	Mid-career hires	%	15.6	37.0	
	Ratio of foreign employees	%	0.5	0.5	Excluding technical trainees
	Ratio of employees with disabilities to the total number of employees	%	2.56	2.61	

Comparison Table for the UN Guiding Principles Reporting Framework

Part A: Governance of Respect for Human Rights			Corresponding page
Policy commitment	A1.1	How has the public commitment been developed?	pp. 6–9
	A1.2	Whose human rights does the public commitment address?	pp. 7, 27–28
	A1.3	How is the public commitment disseminated?	pp. 8, 21
Embedding respect for human rights	A2.1	How is day-to-day responsibility for human rights performance organized within the company, and why?	p. 5
	A2.2	What kinds of human rights issues are discussed by senior management and by the Board, and why?	p. 5
	A2.3	How are employees and contract workers made aware of the ways in which respect for human rights should inform their decisions and actions?	pp. 8–19
	A2.4	How does the company make clear in its business relationships the importance it places on respect for human rights?	pp. 6–7, 15, 19, 23
	A2.5	What lessons has the company learned during the reporting period about achieving respect for human rights, and what has changed as a result?	pp. 10–19
Part B: Defining the focus of reporting			
Statement of salient issues	B1	State the salient human rights issues associated with the company's activities and business relationships during the reporting period.	p. 9
Determination of salient issues	B2	Describe how the salient human rights issues were determined, including any input from stakeholders.	p. 9
Choice of focal geographies	B3	If reporting on the salient human rights issues focuses on particular geographies, explain how that choice was made.	p. 9
Additional severe impacts	B4	Identify any severe impacts on human rights that occurred or were still being addressed during the reporting period, but which fall outside of the salient human rights issues, and explain how they have been addressed.	pp. 9–19
Part C: Management of Salient Human Rights Issues			
Specific policies	C1.1	How does the company make clear the relevance and significance of such policies to those who need to implement them?	pp. 8, 10–22
Stakeholder engagement	C2.1	How does the company identify which stakeholders to engage with in relation to each salient issue, and when and how to do so?	pp. 10–23
	C2.2	During the reporting period, which stakeholders has the company engaged with regarding each salient issue, and why?	pp. 10–19
	C2.3	During the reporting period, how have the views of stakeholders influenced the company's understanding of each salient issue and/or its approach to addressing it?	pp. 10–19
Assessing impacts	C3.1	During the reporting period, were there any notable trends or patterns in impacts related to a salient issue and, if so, what were they?	pp. 7, 10–19
	C3.2	During the reporting period, did any severe impacts occur that were related to a salient issue and, if so, what were they?	pp. 15, 19
Integrating findings and taking action	C4.1	How are those parts of the company whose decisions and actions can affect the management of salient issues, involved in finding and implementing solutions?	p. 5
	C4.2	When tensions arise between the prevention or mitigation of impacts related to a salient issue and other business objectives, how are these tensions addressed?	p. 5
	C4.3	During the reporting period, what action has the company taken to prevent or mitigate potential impacts related to each salient issue?	pp. 10–22
Tracking performance	C5.1	What specific examples from the reporting period illustrate whether each salient issue is being managed effectively?	pp. 10–22
Remediation	C6.1	Through what means can the company receive complaints or concerns related to each salient issue?	pp. 5, 22
	C6.2	How does the company know if people feel able and empowered to raise complaints or concerns?	pp. 20–22
	C6.3	How does the company process complaints and assess the effectiveness of outcomes?	pp. 5, 22
	C6.4	During the reporting period, what were the trends and patterns in complaints or concerns and their outcomes regarding each salient issue, and what lessons has the company learned?	pp. 8–22
	C6.5	During the reporting period, did the company provide or enable remedy for any actual impacts related to a salient issue and, if so, what are typical or significant examples?	pp. 8–22

Sumitomo Rubber Group Human Rights Policy

The “Sumitomo Rubber Group Human Rights Policy” was established based on international standards, including relevant treaties and principles, and was approved by the Board of Directors. This policy articulates the Group’s commitment to respecting human rights and serves as the highest policy governing all other regulations and guidelines enforced within the Group regarding how we ensure respect for human rights.

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.”^{*1} 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.^{*2} 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



^{*1}  Code of Conduct

^{*2}  The Corporate Ethics Helpline

Our Efforts to Address Individual Human Rights Issues

Diversity and Individual Dignity

We respect the uniqueness of each individual, privacy and diversity. We prohibit harassment and discrimination based on ideology, creed, religion, race, color, nationality, language, social status, origin, gender, sexual orientation, gender identity, gender expression, age, physical or mental disabilities, employment status or hiring method. We do not engage in any form of acts that degrade the dignity of individuals.

Additionally, we strive to ensure that all individuals have equal opportunities to demonstrate their abilities to the fullest by implementing hiring, evaluation, and treatment based on fair and transparent standards. Furthermore, we are committed to building inclusive workplace environments where people from diverse backgrounds can understand and support each other.

Labor and Workplace Environments

We do not allow any inhumane labor practices and strive to establish a supportive and suitable working environment.

- We do not tolerate any form of modern slavery, including human trafficking, within our operations.
- Recognizing migrant and foreign workers as vulnerable stakeholders, we do not tolerate any unfair treatment of them.
- We do not engage in child labor, which constitutes the hiring of children under the minimum working age as stipulated by the laws and regulations in the countries and regions where we operate. We ensure that infants and children are not forced into labor and thereby hindered in their healthy growth and access to education.
- We respect freedom of association and the right to collective bargaining, in accordance with laws and regulations in the countries and regions where we conduct our business.
- Furthermore, we comply with laws and regulations related to minimum wages, vacation entitlements, health and safety, and labor practices, as well as adhere to appropriate working hours.
- We promote ethical recruitment activities in line with international labor standards and strive to maintain fair and transparent employment processes.

Right to Privacy

We comply with the laws and regulations concerning the personal information of respective countries and regions. We take all necessary and appropriate measures to ensure the security and safeguarding of personal information.

☑ [Reference] Privacy Policy Sumitomo Rubber Industries, Ltd.

Land Issues and Indigenous Peoples' Rights

We respect the fundamental "Principle of Free Prior Informed Consent (FPIC)" and do not participate in any land-grabbing activities. In cases where we acquire land for plantations or industrial purposes, we take measures for affected indigenous peoples and local communities in accordance with the guidelines on FPIC principles as outlined in the "United Nations Reduction of Carbon Dioxide Emissions from Deforestation and Forest Degradation in Developing Countries" (UN-REDD).

Furthermore, we respect the rights of indigenous peoples and local communities to utilize forest resources for their livelihoods.

Consideration for Local Residents

To prevent adverse impacts on the safety and well-being of the local communities near our business sites, we assess impacts on human rights including pollution prevention, proper wastewater treatment, and water stress, comply with international standards to prevent and mitigate risks, and take necessary measures.

Human Rights Abuses by Security Personnel

When appointing security firms, we comply with the laws and regulations of the respective countries and regions. Additionally, in selecting security firms, we support international guidelines such as the Voluntary Principles on Security and Human Rights, the Code of Conduct for Law Enforcement Officials, and the Basic Principles on the Use of Force and Firearms.

Responsibility for Conflict Minerals

We strive to implement "Responsible Mineral Sourcing" in our supply chain to prevent any complicity in human rights abuses associated with the mining and trading of minerals in conflict and high-risk areas.

☑ [Reference] Procurement Guidelines

☑ [Reference] Supply Chain Management

Ethical Marketing/Product Safety and Quality

We recognize preventing harm to life, body, or property caused by defects in our products, and providing products and services of a quality that does not hinder the trust of our stakeholders as the basis of our business activities. We provide safe products and services by complying with laws and regulations and following our quality management system throughout the entire process from research and development to manufacturing, processing, inspection and distribution to sales.



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Disclaimer: In addition to facts on the past and present of the Sumitomo Rubber Group, this report contains projections based on forecasts and future management plans. Said projections reflect assumptions and judgments based on information available at the time this report was made. Actual future results may differ from these projections.

