



DUNLOP GROUP

HUMAN RIGHTS REPORT 2026

June 2026

TAKING YOU BEYOND

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Disclaimer: This report includes forward-looking statements based on information available at the time of preparation and on assumptions considered reasonable. Actual results may differ materially due to various factors.



TOP COMMITMENT

Respect for Human Rights—A Value Grounded in Our Founding Spirit

As a member of the Sumitomo Group, DUNLOP has positioned the Sumitomo Business Spirit at the core of its operations: “Sumitomo’s business must benefit Sumitomo itself, while also benefiting the nation and society.” With this spirit as our foundation, we have long placed importance on working together with society.

In Sumitomo’s history, including in the operation of the Besshi Copper Mine, which helped lay the groundwork for Japan’s modern industry, we have long recognized that business activities can affect local communities and people’s lives. From an early stage, we sincerely addressed social issues such as smoke pollution with this awareness in mind. This strong sense of social responsibility, rooted in a commitment to people’s lives and rights, has been passed down and remains alive today.

The origin of our manufacturing is also rooted in a spirit of caring for people. For more than a century since our founding, we have pursued manufacturing based on rubber materials and introduced numerous first-of-their-kind products, both in Japan and around the world.

This journey began when John Boyd Dunlop invented the world’s first pneumatic tire to fulfill his son’s wish. The affection reflected in his desire to answer his son, and the underlying commitment to valuing people, represents a way of thinking that aligns with respect for human rights, an idea growing ever more important in corporate activities, and embodies the very spirit that has supported our manufacturing.



The Expansion of Global Business and the Responsibility for Respecting Human Rights Expected of Companies

In recent years, amid growing uncertainty caused by rapid changes in social structures, companies are expected to respond flexibly to a shifting environment and continuously create value by expanding their operations through collaboration with a broader range of regions and more diverse partners.

Under these circumstances, corporate business activities inevitably expand beyond national borders and organizational frameworks, becoming more closely connected than ever to the lives of people with diverse backgrounds.

We operate our business on a global scale, building our business foundation through collaboration with people of diverse cultures and values. Our activities span the entire value chain, from the procurement of raw materials to product manufacturing, logistics, sales, and the provision of services. Precisely because our business is so wide-ranging, we recognize our operations may affect people’s lives and rights at every stage, and that respecting human rights is a fundamental responsibility of a global company.

An Organizational Culture of Respecting Human Rights and Supporting “Our Philosophy”

In 2020, we established our corporate philosophy framework, “Our Philosophy.” It serves as a shared guide that enables our approximately 40,000 colleagues from diverse backgrounds to move forward with one heart. Fostering an organizational culture in which colleagues across the DUNLOP Group worldwide respect one another, engage in open and constructive dialogue, and take joy in collaborating with external stakeholders is essential to realizing our Purpose: “Through innovation we will create a future of joy and well-being for all.”

Practicing Respect for Human Rights Together with All Stakeholders

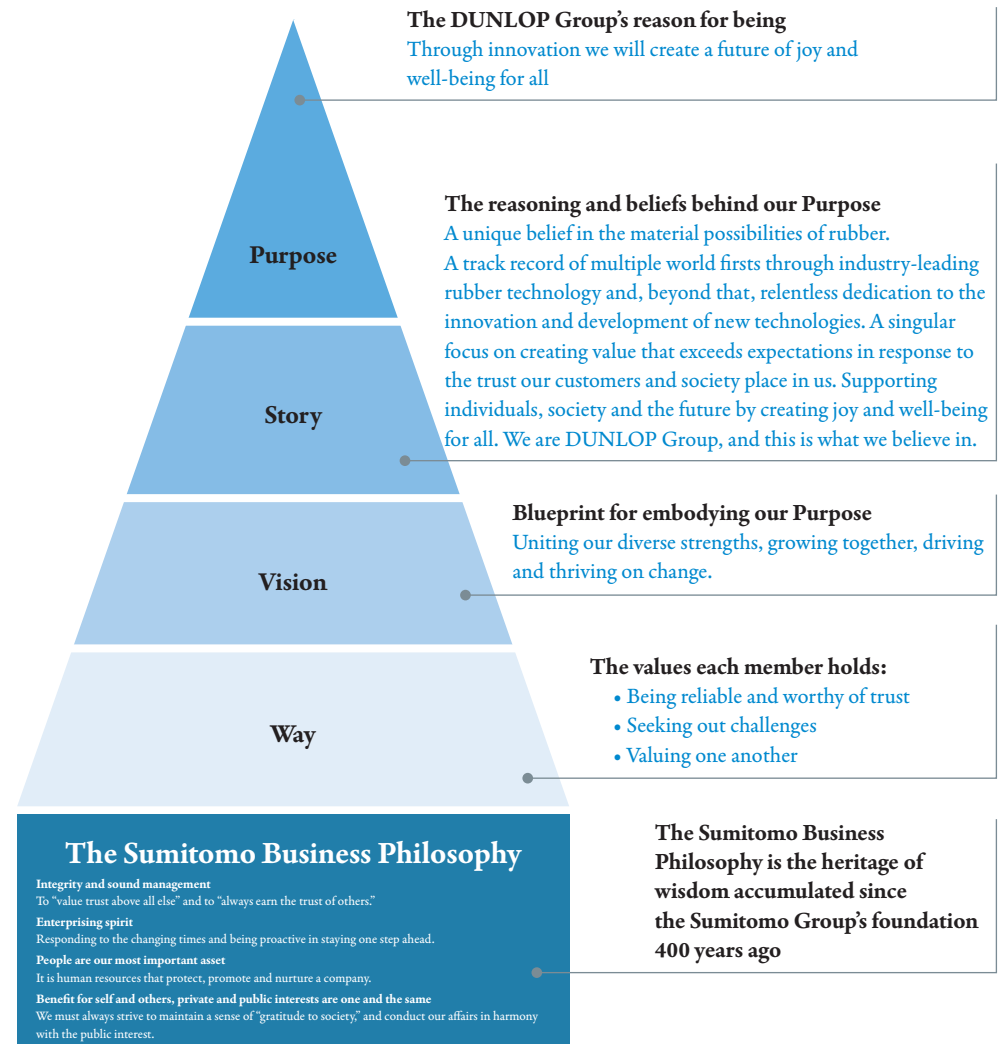
To realize the DUNLOP Group’s Purpose, we believe it is essential to carry forward John Boyd Dunlop’s affection for his son into our commitment to respect for human rights.

Respect for human rights underpins a stable management foundation and contributes to the sustainable development of both society and our Group.

Guided by international standards, we will continue to strengthen our efforts to respect the human rights of all stakeholders as a trusted global company by thoroughly implementing our human rights policy, continuously executing human rights due diligence, and strengthening remediation mechanisms.

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

Our Philosophy, the DUNLOP Group’s Corporate Philosophy Structure



Overview of the DUNLOP Group

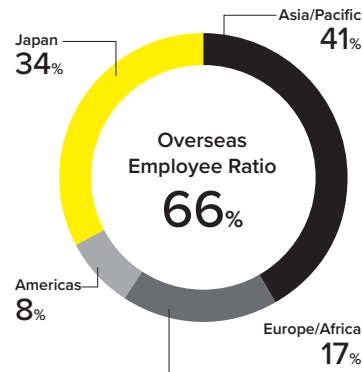
Our Businesses

Employees

• Number of Employees (consolidated)

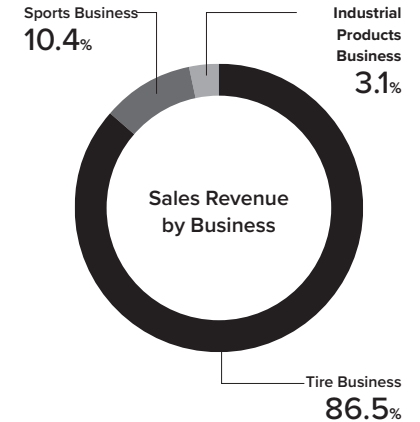
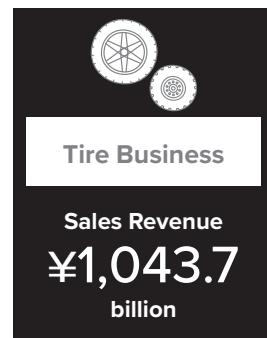
37,671

(As of December 31, 2025)



FY2025 Consolidated Performance

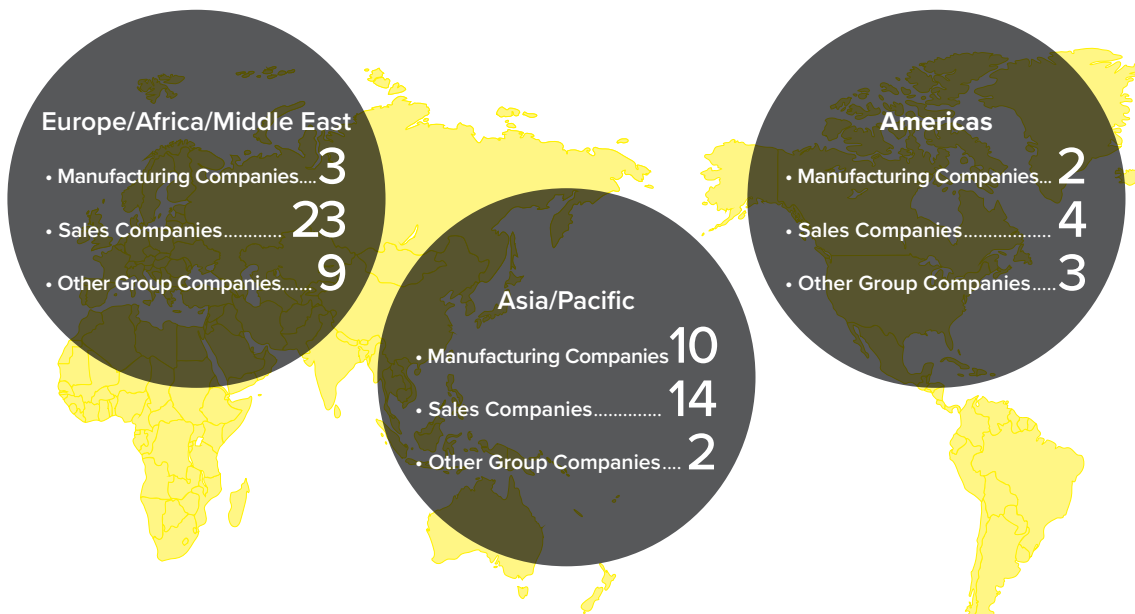
• Total Sales Revenue..... **¥1,207.1 billion**



Business Regions

Global Locations

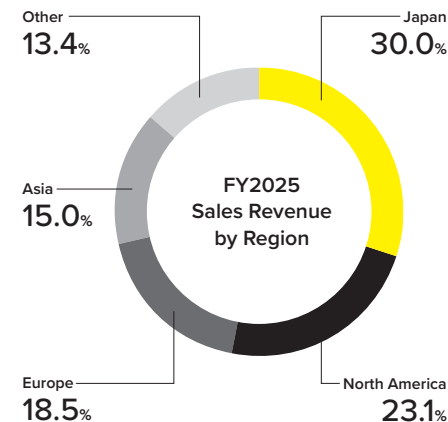
As of December 31, 2025



Domestic Locations/ Major Group Companies

As of December 31, 2025

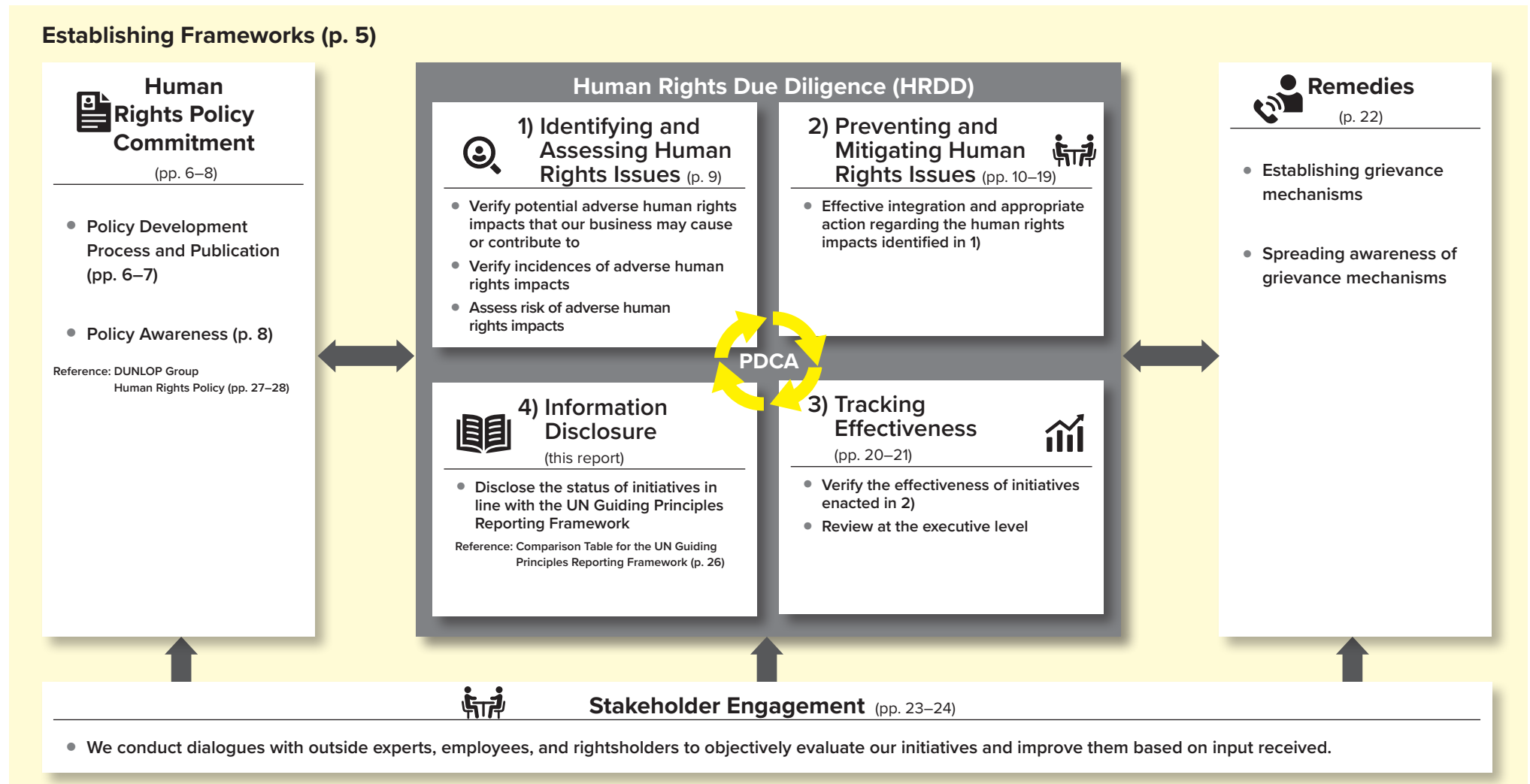
- Offices, Training Centers..... **4**
- Production Bases..... **6**
- R&D Bases..... **6**
- Major Group Companies..... **16**



Our Activities at a Glance

The Group references materials based on the United Nations Guiding Principles on Business and Human Rights and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, such as the Due Diligence Guidance for Responsible Business Conduct and the Japan's Ministry of Economy, Trade and Industry's Guidelines on Respecting 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.



* 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} Our 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.

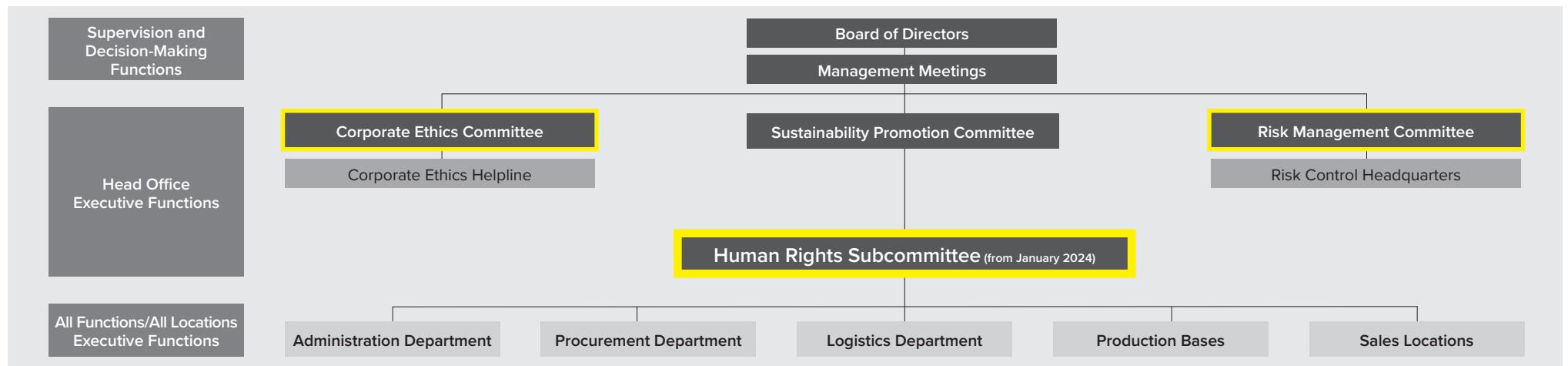
Regular Compliance Training

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 Group-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



DUNLOP Group Human Rights Policy

In November 2023, we established the DUNLOP 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)

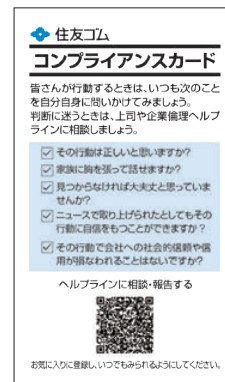
The Policy is based on the guidelines for conducting ethical business activities in the Company’s Corporate Code of Conduct and was established specifically to codify our perspective on respect for human rights.

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

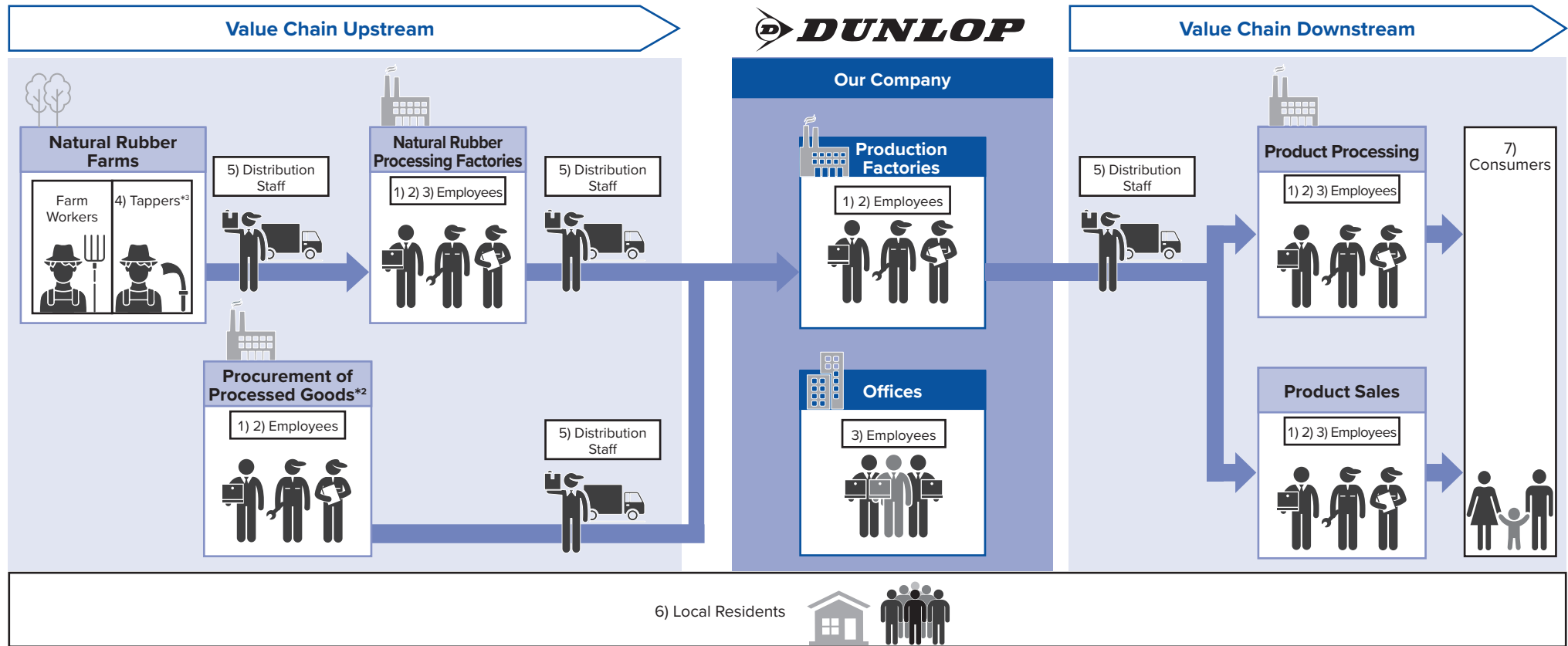
The Group has formulated various policies from the perspective of human rights and is conducting human rights-related initiatives throughout the entire value chain.

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

Overview of sustainability-related policies

Value Chain Risk Map (Overview)

☐ Rightsholders*



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*3	<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) Distribution Staff	<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 Rightsholders: Individuals whose human rights are being, or may be, adversely impacted by a company's activities

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

*3 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.

We continue to provide systematic education and awareness-building so that all employees—from management to frontline skilled workers—can deepen their understanding of human rights and reflect that understanding in their day-to-day decision-making and actions.

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

Executive Dialogue Sessions on Human Rights

Recognizing that human rights risks can affect corporate trust and value, we held discussions by working backward from how serious incidents could escalate and spread.

With the aim of aligning a shared understanding of risks and common decision-making criteria among our executives, we examined the entire chain of impact, from external reactions to effects on our business and brands, thereby strengthening our executive-level preparedness.

Comment from an Executive

When it comes to human rights, it is essential to have the imagination to understand the values of others and the circumstances in which they are placed. We must extend this perspective across all stakeholders with whom the Group is connected—including our global employees, supply chain partners, and customers—and steadily embed the concept of respect for human rights into our corporate systems and practices.



From an Executive Dialogue Session on Human Rights

Initiatives at Our Overseas Manufacturing Sites

At our overseas manufacturing sites, we are working to build a framework that enables each site to proactively provide human rights education, while giving due consideration to local cultures and legal systems.

Beginning in 2025, each manufacturing site has formulated a “Human Rights Implementation Plan,” marking the full-scale launch of initiatives to embed awareness of respect for human rights.

Role-Based Human Rights Seminars

To deepen understanding of human rights and related risks and to foster greater awareness of human rights, we continuously provide training tailored to each job level.

In some programs, we invited attorney Hideaki Umetsu of Mori Hamada & Matsumoto, an internationally recognized law firm with expertise in business and human rights, to deliver lectures on global trends and human rights challenges faced by companies.

In addition, by addressing specific cases and challenges relevant to each job level, we design our programs to ensure that participants gain practical knowledge that can be applied in their day-to-day work.

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 administrative roles (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

For manufacturing roles (FY2025–FY2026)

Date held	Content
2025–2026	<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"> • Peer-to-peer discussions among participants • Case studies reflecting issues likely to arise in the workplace

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 internally distributed materials regarding human rights risks that our actions 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



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, we identify 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"> • Institutional 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 the 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 		(p. 14)	
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 			
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	(pp. 17–19)	
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 DUNLOP Group aims to create workplaces where all employees can work safely and with a sense of well-being. Under the slogan “Safety and health take priority over everything,” we are promoting activities centered on “building safe facilities” and “developing a safety-conscious workforce,” while also enhancing healthy and comfortable workplace environments that support these efforts. By fostering a safety culture in which everyone can participate, we seek to achieve both business growth and our social responsibilities, and will continue to pursue ongoing improvements while responding flexibly to changing circumstances.

1. Strengthening Top Commitment

Our Group has established the Global Committee for Occupational Safety, Health, and Fire Prevention to strengthen dialogue with executives and the management review function.

2. Strengthening collaboration among safety and health managers

We will continue effective safety activities by training safety promotion leaders at each global site and establishing a support structure that leverages their network.

3. Creating safe workplaces through two-way dialogue

Management will engage in ongoing dialogue with workplaces and promote workplace improvements that incorporate employees' feedback.

Review and Issues from Fiscal Year 2025

We take with utmost seriousness the tragic loss of two precious lives in 2025 as a result of an equipment entanglement accident and a rim failure that resulted in flying debris.

To achieve “zero” serious accidents, we will focus on high-risk incidents that could lead to severe outcomes and strengthen preventive measures.

By clarifying roles and responsibilities, we aim to ensure that everyone, from new employees to top management, understands and practices safe behaviors.

Mid- to Long-Term Targets	Increase knowledge on safety and accident prevention, create workplaces in which workers can protect each other, and realize ESG management to ensure peace of mind
FY2025 Results	<ul style="list-style-type: none"> Number of serious accidents: 2 Development of Risk Assessment Instructors: 94
FY2026 Targets	<ul style="list-style-type: none"> Occupational Safety and Health Activity Policy 1) Establish safety standards for each piece of equipment. 2) Ensure conformity with the established standards. 3) Enable employees at each level to practice expected safety actions. Target Number of serious accidents: 0

Group Occupational Safety & Health



External Evaluations and Certifications

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 Group factories worldwide have acquired this certification (50% of our 24 factories) 	2009–2025
	KENKO Investment for Health <ul style="list-style-type: none"> Recognizes excellence in health management Run by the Ministry of the Economy, Trade and Industry as well as the Nippon Kenko Kaigi (Japan Health Council) 	2017–2026
	Sports Yell Company 2025 <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 	2023–2026

Topics: Examples of Good Business Operations

“Safety Olympics” to Foster Safety Culture

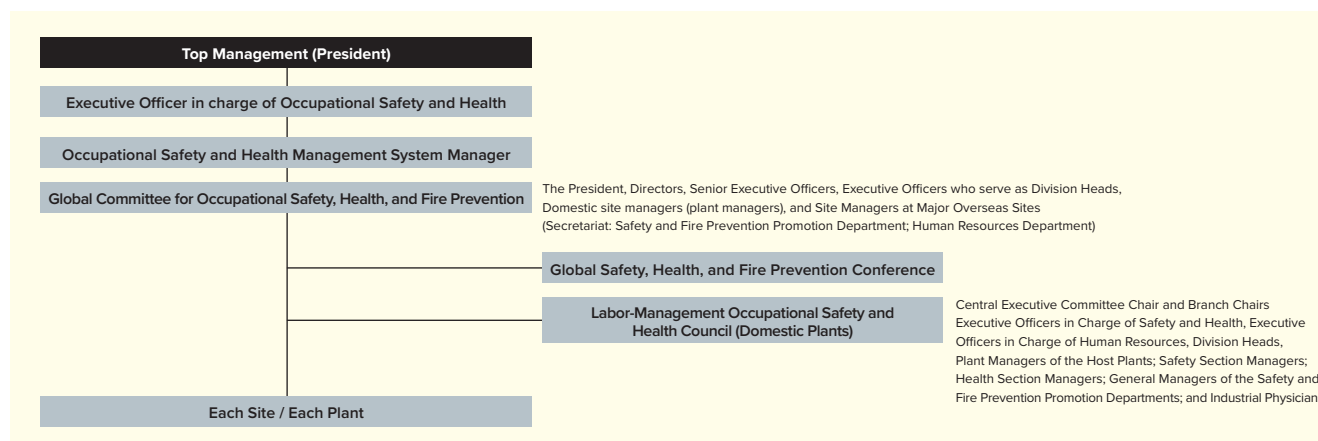
At our plant in Brazil, we hold a “Safety Olympics” with the aim of promoting safety culture and raising employees' awareness of safety. This initiative is intended to encourage employees to learn about safety proactively and to link that learning to ongoing improvements in work processes. Management is also actively involved in holding the event, and by demonstrating our Group's stance of prioritizing safety above all else, it has led to employees' active participation.

In the Safety Olympics, we first conduct a questionnaire for all employees on safety, ergonomics, and health to confirm their level of understanding and awareness regarding safety. Based on the results, we then implement knowledge tests and practical/theoretical tests on safety in stages and evaluate employees based on such criteria as their understanding of work procedures and their safety actions.

We recognize the top performers in each category, helping to enhance employees' motivation. This initiative has also provided an opportunity to reaffirm that the safety training we have conducted to date is functioning appropriately at worksites. Going forward, we will continue working to embed a safety culture through employee participation initiatives.



Occupational Safety and Health Promotion Structure



Building a Safety-Conscious Workforce

Education and Awareness-Raising Activities

With the aim of achieving “zero serious accidents,” DUNLOP Group is working on “building safe facilities” and “developing a safety-conscious workforce.” We position knowledge of safe design as a key issue and are strengthening education to enhance risk assessment capabilities to identify hazards, as well as the development of instructors.

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	Education 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

Oversight of Safety and Health through the Global Safety, Health, and Fire Prevention Conference

With the participation of the Representative Director and President, other internal directors, all executive officers, and the heads of all manufacturing sites, we hold a semiannual “Company-wide Safety,



Global Safety, Health and Fire Prevention Conference

Health and Fire Prevention Conference” as an activity to share information on “safety,” “fire prevention,” and “health” across all employees. By sharing the targets and progress of initiatives related to the our Group’s occupational safety and health and health management, we work to reduce the our risk levels related to “safety,” “fire prevention,” and “health.”

Promoting Health and Well-Being

We believe that building “a workplace environment in which every employee can be healthy while they work” will help ensure safety. The functions of the former “Health Management Office” were transferred to the Well-being Promotion Group of the Human Resources Department, and we are promoting health and productivity management primarily through this group.

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 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 personal and family support Special leave system for times of poor health Provide work support in collaboration with industrial health specialists (industrial physicians and nurses) and family doctors Work-related considerations and a shorter working hours system to support balancing treatment and work
Measures against epidemics	<ul style="list-style-type: none"> Subsidy for influenza vaccination Support for preventive vaccination of staff assigned to overseas locations, etc.

DUNLOP Group Health and Productivity Management Declaration

Raising Fire 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 a Safe Working Environment

Improving Operational Environments

To protect employees’ occupational safety and health, we have continued to create operational environments where work can be performed safely and with peace of mind. In fiscal year 2025, we also strengthened improvements to operational environments related to heat, noise, dust, organic solvents, and other factors, and worked to enhance workplace conditions. In fiscal year 2026, we will continue to focus our efforts on heat countermeasures and work to further improve workplace operational environments.

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 Group 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.

Topics: Examples of Good Business Operations

Safety Improvements Leveraging Employee Feedback

At our Group’s plant in China, we are promoting initiatives to leverage employees’ feedback for safety improvements. Previously, we collected input by listening at the worksite to workers’ concerns and improvement suggestions, which the person in charge then entered, recorded and detailed in a form. However, this approach required time for interviews and data entry, and it was also difficult to collect opinions from all workers.

To address these issues, we developed an in-house chat application and introduced a system that enables employees to report concerns and improvement suggestions directly from their smartphones. This has made it possible to share employees’ observations in a timely manner and to leverage a broader range of worksite feedback for safety improvements.

The plant in China is also working on safety activities to enhance understanding and compliance with work standards. Study sessions using work standards are held for each process, where employees confirm procedures and operational risks and provide improvement suggestions based on their own experience. In addition, through video-based education built on past accident cases and on-site practical guidance, we are deepening understanding of work procedures. Through these initiatives, we are linking each employee’s observations and learning to create safer operational environments.



Our Approach (Own Workforce): Promotion of DE&I Initiatives

Basic Perspective

As a Group, creating a workplace where our people respect one another's diverse backgrounds and perspectives, transform that diversity into collective strength, and everyone is empowered to take on challenges with confidence is fundamental to respecting human rights. Diversity, Equity & Inclusion (DE&I) is indispensable to achieving this.

Under the strong commitment of top management, the Group is steadily advancing its DE&I initiatives with the aim of fostering a corporate culture in which diverse talent can come together, combine their strengths, and continuously enhance both corporate value and social value. These initiatives are closely linked to the Group's efforts to address human rights issues identified as material, including our zero-tolerance stance on any form of harassment, the prohibition of discrimination, and the promotion of equality under the law, as well as the protection of the rights of foreign workers. To this end, we are sincerely addressing human rights issues through initiatives, such as reviewing internal systems, establishing consultation and grievance channels, and conducting regular training programs, with the objective of creating a safe, supportive, and rewarding work environment in which all employees can work with peace of mind and fully demonstrate their individual potential.

DE&I Top Commitment

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

The DUNLOP 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 DE&I

Our 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, recruitment method, etc.
- Birthplace, nationality, race, ethnicity, culture, religion, etc.

President and Representative Director Sumitomo Rubber Industries, Ltd.
Yasuaki Kuniyasu



DUNLOP DE&I Top Commitment

Initiatives to Address the Gender Gap

One of the key issues that must be addressed in creating an environment in which diverse talent can demonstrate their capabilities is closing the gender gap. Within existing social structures and corporate cultures, various disparities have emerged between women and men. For example, women have historically faced fewer opportunities for career development compared with men, while men, in turn, have had more limited access to diverse and flexible ways of working.

From the perspective of "E (Equity)" in the Group's DE&I framework, our efforts to address the gender gap are not intended to favor specific individuals. Rather, they are initiatives aimed at correcting structural imbalances that have emerged within society and organizations, and at establishing a foundation in which capabilities and performance are evaluated fairly and appropriately, regardless of gender.

As part of these efforts, the Group is working to address the gender gap through measures such as increasing the ratio of women in management positions and among new hires and reviewing childcare leave for men and promoting its use.

We view these initiatives as efforts to reassess how evaluations and opportunities are structured across the organization. Ultimately, they contribute to creating a workplace in which each individual, embraces diverse backgrounds and attributes, can fully demonstrate their strengths, and where everyone is able to work with a sense of fulfillment in a fair and equitable environment.

Initiatives

- Participation by top management in the Cabinet Office's "Group of Leaders to Accelerate Women's Active Participation"
- Enhancing understanding and encouraging practical implementation of DE&I among officers and management
- Providing various training programs, including those on unconscious bias and compliance
- Issuance of the "Work-Life Balance Support Manual for Everyone"
- Promoting diverse work styles for men, including expanding childcare leave and paid leave systems
- Implementing a range of initiatives at operational sites, including manufacturing, experimentation, and testing sites

Support for Women's Career Development

- Development of women candidates for executive leadership
- Supporting autonomous career development through individualized training, including for management positions
- Supporting career development through internal and external mentoring programs
- Co-hosting career development event for female engineers with two other manufacturing companies from Hyogo and Kobe



Established the "Work-Life Balance Support Manual for Everyone" (childcare edition and caregiving edition) for employees and for managers, respectively.

Initiatives to Create Inclusive Manufacturing Sites for All

Future Factory Project for Better Workplaces

To address the various challenges facing manufacturing sites through close collaboration between factories and headquarters, we launched the "Future Factory Project for Better Workplaces" in July 2024. Going forward, we will continue to expand our activities and accelerate measures that support both job satisfaction at production sites and sustainable growth.

Striving to Create Factories Where Everyone Can Thrive

At manufacturing sites, in addition to issues related to aging equipment and welfare facilities, there has also been room for improvement in the collaboration framework between production and R&D functions at headquarters and factory operations. With a declining working-age population, securing and retaining human resources is one of the most critical challenges for the manufacturing industry. In this context, for manufacturing sites where many colleagues of diverse nationalities are active, creating attractive and inclusive workplaces that are accessible and comfortable for diverse talent has become an urgent priority.

Through the "Future Factory Project for Better Workplaces," we are advancing reforms to organizational culture, organizational structures, and various systems, with human capital as the central focus. Through these efforts, we aim to create workplaces that attract diverse talent and enable everyone to play an active role with a sense of purpose and fulfillment.

Initiatives

- Reviewing the operating calendar and focusing on creating an environment where it is easier to take time off
- Optimizing Group-wide guidelines for capital investment
- Reviewing and executing investment plans for capital investment
- Reviewing workforce structures, work schedules, human resource development, and other areas
- Conducting interviews with approximately 200 employees on workplace accessibility and ease of working, and conducting in-depth analysis of identified issues
- Headquarters leading cross-functional initiatives that reflect the circumstances of each factory
- Conducting our own engagement survey, monitoring improvement effects over time, and continuously promoting understanding and dialogue



The factory manager standing at the gate and handing out flyers about the project.

The factory manager and employees interacting in the newly renovated break room.

An executive officer exchanging views with staff at the factory.

LGBTQ+ Related Initiatives

Initiatives to foster acceptance of sexual minorities serves as a foundation for embracing diversity more broadly, while also contributing to greater awareness and understanding of human rights. With the aim of eliminating discrimination related to sexual orientation and gender identity in the workplace and creating an environment in which everyone can work as their authentic selves, we are promoting a range of initiatives designed to raise individual understanding and awareness, thereby increasing the number of Allies—those who understand and actively support sexual minorities. In recognition of these efforts, the Group received the Gold rating in the PRIDE Index 2025 for the fourth consecutive year.

Initiatives

Promoting Understanding and Awareness

- Issued an LGBTQ+ Handbook
- Conducted training sessions to enhance understanding of LGBTQ+ issues for recruitment interviewers and managers
- During Pride Month in June, when activities and events to promote LGBTQ+ rights are held around the world, displayed rainbow flags at the Kobe Head Office, Tokyo Head Office, and six manufacturing sites in Japan



Issued an LGBTQ+ handbook

- Distributed Pride Month-themed virtual backgrounds for web meetings
- Participated in external events, set up panels on the Group's LGBTQ+ initiatives, and showcased our efforts



Pride Month-themed virtual backgrounds recommended for use in web meetings

Creating an Inclusive Environment

- Shared information through an internal community
- Distributed Ally stickers

Creating Inclusive Environments for LGBTQ+ employees

- Established and operated internal and external consultation channels
- Established a registration system for same-sex partners



PRIDE design for "Chabo," the DE&I communications character

Promoting the Success of Persons with Disabilities

The Group operates a special subsidiary, SRI Business Associates Co., Ltd., which promotes the employment of persons with disabilities. In its WITH Division, the subsidiary has established the following purpose: "We respect one another, walk together, and share 'Safety and Joy' with everyone we are connected to," and undertakes work that supports our Group's activities. This purpose embodies the belief that, based on the premise that not all employees can perform tasks at the same level due to disabilities, the Group seeks to create a workplace where everyone can find a sense of purpose and fulfillment through their work.

In terms of employee support, job coaches on staff play a central role in promoting workplace-wide efforts to support job retention and adaptation, provide ongoing guidance and support, and encourage active communication across the workplace. The subsidiary is also working to standardize and systematize operations by incorporating "visual supports," enabling persons with disabilities to intuitively understand tasks and perform their work effectively.

Our ability to consistently deliver reliable work through these two complementary efforts—developing people and creating easy to work systems—was also showcased as an example of outstanding quality initiatives at the Group-wide quality convention, "Quality Forum 2025: Connecting to the Future."



Work standards designed for visual clarity, incorporating photographs and other visual aids



Various initiatives introduced at the Quality Forum as examples of outstanding quality activities

Promoting the Success of Senior Employees




Under the previous reemployment system, compensation and employment conditions treatment after reemployment were uniformly reduced. However, in April 2021, the Group introduced a role-based grading system for managers. In alignment with this reform, a role grade system was also introduced for reemployed employees starting in 2022.

As a result, employees who continue to take on line management responsibilities, as well as those who actively contribute by leveraging their expertise, have emerged as examples of senior talent who are able to remain active with compensation and treatment equivalent to their pre-retirement levels.

In addition, the Group introduced a new Career Vision Training program for employees in their 50s in 2024. To support employees in maintaining high motivation and continuing to play active roles within the Group and society beyond their 50s and into their 60s, the program provides opportunities to review and reflect on their existing skills and experience, gain a better understanding of future career options, and consider reskilling as well as career paths that they can pursue with a sense of confidence and satisfaction.



External Evaluations and Certifications as of FY2025

Certification	Content	Year awarded
	L-boshi Certification (Three Stars) A certification system under Japan's Act on Promotion of Women's Participation and Advancement in the Workplace, under which employers that formulate and submit a general employer action plan and meet certain requirements—such as having excellent initiatives to promote women's advancement—are certified.	2020–2025
	Hyogo-Kobe Certification for Promoting Women's Active Participation (Mimosa Company) A certification system established in 2022 jointly by Hyogo Prefecture and Kobe City that certifies companies and other organizations that actively promote women's participation and advancement and diverse working styles as "Hyogo-Kobe Companies Promoting Women's Active Participation (Mimosa Companies)."	2023–2025
	D&I Award Best Workplace Japan's largest award program that recognizes and honors companies working on diversity & inclusion, organized by JobRainbow Co., Ltd.	2023–2025
	PRIDE Index – Gold Rating An index implemented by Work with Pride, a general incorporated association, that evaluates initiatives related to sexual minorities such as LGBTQ+.	2022–2025

Our Approach (Own Workforce): Rights of Foreign Workers

Basic Perspective

We recognize that foreign workers face a range of human rights risks, including the improper collection of fees related to recruitment, forced labor and excessive working hours, discrimination, and harassment in the workplace.

Through a series of processes—from identifying risks prior to acceptance, to follow-up after acceptance, and then ongoing monitoring—we work to prevent and mitigate human rights risks.

When accepting foreign workers, the Group works primarily through the human resources departments at host sites to create an environment in which foreign workers can work and live with a sense of security and peace of mind.

Employment Status of Foreign Workers at Domestic Plants

Domestic Plants (Standalone)	Number of Foreign Employees (persons)	Of Which: Technical Intern Trainees (persons)
Shirakawa Plant	30	30
Nagoya Plant	15	—
Izumitsu Plant	0	—
Miyazaki Plant	1	—
Ichijima Plant	0	—
Kakogawa Plant	8	4
Total	54	34

* As of December 31, 2025

Employment Status of Foreign Workers at Overseas Manufacturing Sites

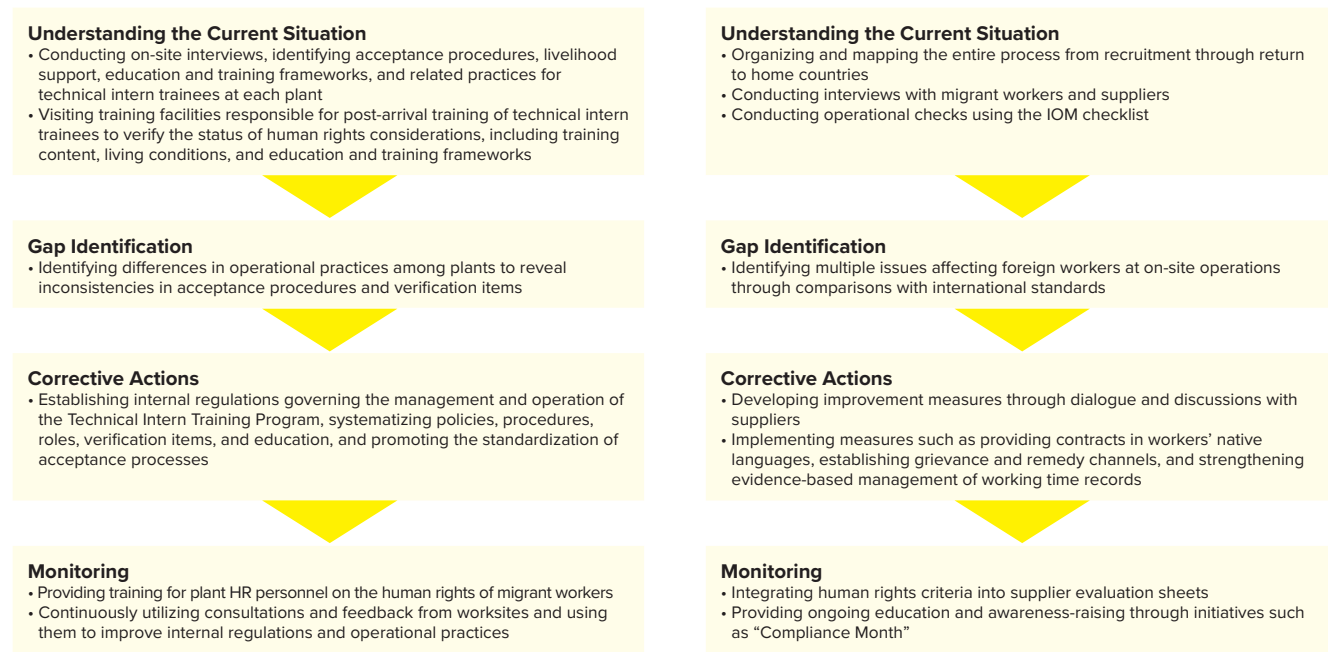
Item	Number of Sites
Sites where foreign workers work on-site	4/14
Sites that directly employ foreign workers	3/14

Initiatives

Human Rights Due Diligence at Domestic Plants

At domestic manufacturing sites, more than 60% of foreign employees are technical intern trainees. Accordingly, the Group is prioritizing the development of systems and mechanisms to ensure respect for the human rights of technical intern trainees and is advancing these efforts in a phased manner.

In 2025, with the establishment of internal regulations governing the management and operation of the Technical Intern Training Program and the implementation of training programs for plant HR personnel as key pillars, the Group worked to standardize acceptance process and enhance understanding at production sites.

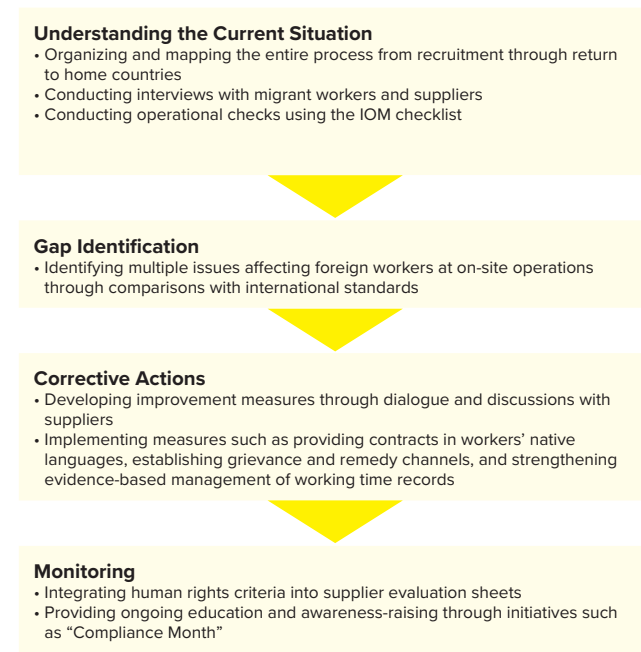


Through these initiatives, the Group is enhancing consistency and transparency in the implementation of human rights-related practices for technical intern trainees, while strengthening practical implementation capabilities at worksites.

Human Rights Due Diligence at Overseas Plants

The Group is advancing the development of a human rights due diligence framework, prioritizing overseas sites that accept a relatively large number of migrant workers, who are considered to face higher human rights risks.

At the Thailand plant, with support from the International Organization for Migration (IOM), the Group is conducting human rights due diligence through the following four-step process.



Through these initiatives, the Group is making human rights risks specific to migrant workers more visible and translating these insights into improvement initiatives that include suppliers. The initiatives implemented at the Thailand plant thus far have also been shared with other sites at the Human Rights Global Summit (p. 15) as a model case for conducting human rights due diligence at overseas manufacturing sites.

Topics: Hosting the Global Human Rights Summit

To establish a foundation for advancing our human rights due diligence, the Group held the “Global Human Rights Summit” from November 17 to 19, 2025. Human rights promotion representatives from manufacturing sites in Japan and overseas participated in the summit to discuss our responsibility to respect human rights under international standards, share human rights issues, deepen understanding of risks related to migrant workers, and consider improvement actions.

Objectives	<ul style="list-style-type: none"> • Deepening understanding of the foundation for the Group’s human rights initiatives (Our Philosophy) • Translating shared values across the Group into the practice of human rights due diligence • Building collective knowledge through the sharing of issues and the consideration of response measures • Establishing global connections that enable coordinated responses to human rights issues beyond the Summit
Schedule	Monday, November 17, 2025 to Wednesday, November 19, 2025
Participants	Human rights promotion representatives from manufacturing sites that accept migrant workers (including sites planning to do so) as well as from manufacturing sites involved in sending migrant workers
Program	<p>Day 1 (November 17): Deepening Understanding of Our Philosophy and Sharing Values On the first day, a session was held to deepen understanding of Our Philosophy, the core values upheld by the Group. Through dialogue among participants, views were exchanged and the fundamental approach to promoting respect for human rights, as well as on principles of action shared across sites. Through these discussions, a common understanding was built regarding the direction the Group should pursue as an organization.</p> <p>Day 2 (November 18): Sharing Issues Related to the Human Rights of Migrant Workers On the second day, a lecture delivered by the International Organization for Migration (IOM) deepened participants’ understanding of international perspectives on migrant workers. Through workshops, participants shared the challenges faced at their respective sites and confirmed the existence of key issues common across sites, including transparency in recruitment processes, the improvement of living environments, and collaboration with suppliers.</p> <p>Day 3 (November 19): Considering Human Rights Due Diligence Plans On the final day, building on the discussions to that point, each site examined a draft action plan for addressing human rights due diligence. Taking into account the specific characteristics of each country and region, participants formulated concrete improvement actions to address the identified issues and established a foundation for implementation plans that will guide initiatives from fiscal year 2026 onward.</p>

Comments from Participants

Participant A:

By hearing directly about specific initiatives at other production bases, I was able to gain many insights that could lead to improvements at my own plant. In particular, the examples from the Vietnam and Brazil plants were similar to our to day-to-day operations and provided a good opportunity to think about where we should begin. I again felt the value of learning from one another within the Group.

Participant B:

The case study on human rights due diligence at the Thailand plant captured situations that could realistically occur on-site, enabling me to clearly envision how to apply the lessons learned to my work. Also, being able to share recruitment methods and issues at each production base was a very valuable opportunity to strengthen horizontal connections. Going forward, I would like to make use of what I learned this time in training at my own worksite as well.



Going forward, the Group will implement improvement initiatives based on the action plans developed, while further strengthening cross-site collaboration. In addition, the Group will monitor progress at each site and work to further enhance the effectiveness of human rights due diligence.

Our Approach (Value Chain): Entire Value Chain

Basic Perspective

In dialogue with our business partners, we put the importance of sustainable measures at 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 aim of promoting sustainable procurement, the Group issued the 8th edition of its Sustainable Procurement Guidelines in July 2024.

These guidelines request compliance with applicable laws and regulations related to human rights in each country and region and call on business partners to engage in initiatives to respect human rights.

The Group has asked its business partners to share these guidelines with their own suppliers as well. As a result, the Group has received letters of acceptance of the guidelines from approximately 90% of its tire raw material suppliers.

- ☑ 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 improve their activities if the results of evaluations are below a certain standard

Results of Fiscal Year 2025 Initiatives

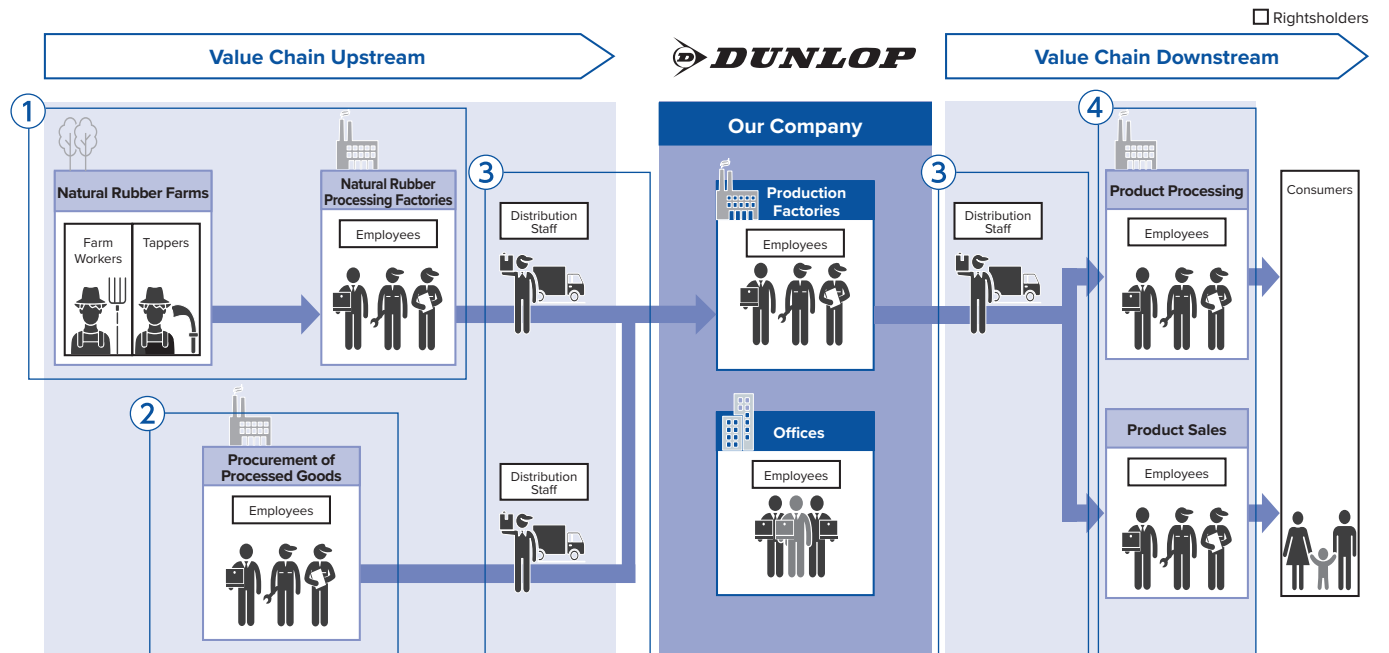
We achieved our goal of using 95% of our purchasing funds to procure materials from suppliers who scored higher than the standard 45 points on evaluations.

- ☑ Supply Chain Management

Human Rights Due Diligence (HRDD) Approach

Based on a roadmap formulated in consideration of the potential impact and severity of human rights risks, the Group is proceeding with initiatives in each area in a phased and systematic manner.

In fiscal year 2025, in addition to the initiatives targeting upstream segments of the value chain that have been underway since fiscal year 2024, the Group also placed greater emphasis on downstream segments and conducted human rights due diligence across the value chain.



1) Natural rubber	In fiscal year 2025, the Group conducted site visits and dialogues at rubber plantations and processing facilities in Indonesia, with which the Group has close relationships (pp. 17–19).
2) Suppliers	In addition to the Tire Business, initiatives are being advanced for suppliers related to Sports and Industrial Products.
3) Logistics	The development and implementation of strategies are scheduled to commence from 2026 onward.
4) Value Chain Downstream	Human rights due diligence has been conducted for the Group's sales companies.

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 our 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

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 \(GPSNR Project\)](#)

Initiatives from the Human Rights Subcommittee

Natural rubber farms are hotspots^{*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 farm operators’ effects on residents in the area, the Group 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) (Japanese only)

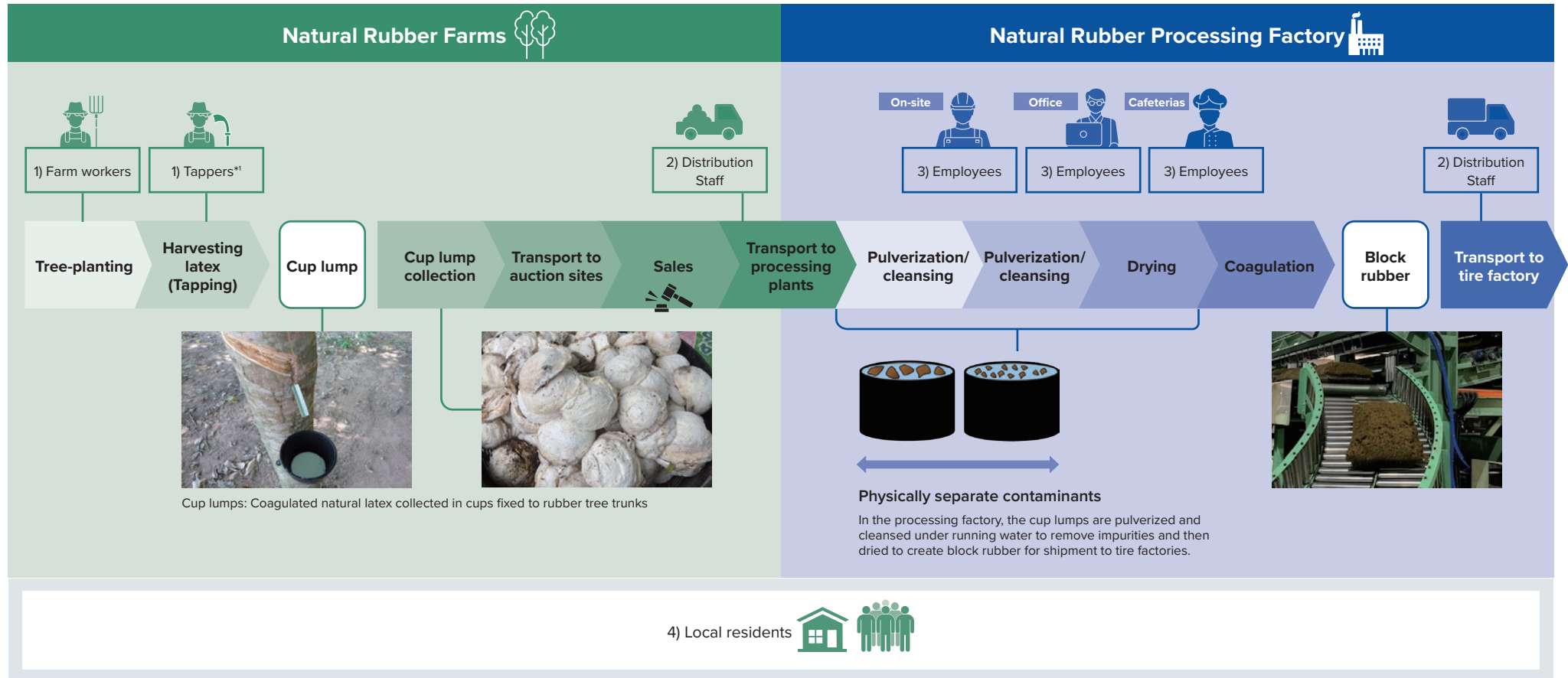
2025 Visit Destination: Indonesia (p. 19)

In fiscal year 2025, the Group utilized “RubberWay,” a risk-mapping tool specialized for natural rubber while conducting site visits to rubber plantations in the Jambi Province of Indonesia. This region has been identified as presenting risks such as low wages and underdeveloped agricultural practices.

South Sumatra, Indonesia



Value Chain Risk Map (Natural Rubber)



Rightsholders*2	Expected Risks
1) Farm Workers, Tappers*1	<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) Distribution Staff	<ul style="list-style-type: none"> Hazardous/unsafe working environments Imposition of longer working hours via abrupt schedule changes

Rightsholders*2	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

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

*2 Rightsholders: Individuals whose human rights are being, or may be, adversely impacted by a company's activities

Topics: Visiting Natural Rubber Plantations and Processing Facilities (Indonesia)

To identify and mitigate human rights risks across the Group’s value chain, the secretariat of the Human Rights Subcommittee conducted site visits to natural rubber plantations in Indonesia.

In addition to observing local conditions, we conducted interviews with plantation workers and relevant stakeholders to identify potential environmental and human rights risks.

Income	<ul style="list-style-type: none"> Many stakeholders indicated that 1 USD per kilogram represents the minimum viable price for natural rubber, noting that it would be difficult to sustain operations if prices were to fall below this level.
Production Base	<ul style="list-style-type: none"> Fungal growth (mushrooms) leading to reduced yields was observed on rubber trees. Several plots contained aging trees approximately 30–35 years old, indicating a strong need for felling and renewal (replanting). Increased rainfall due to climate change has reduced tapping frequency and weakened tree vitality, with leaf shedding and reduced latex yields observed over the past five years. Rising prices of fertilizers and agrochemicals have placed financial pressure on the household budgets of many farmers. Many farmers have not yet received systematic training aimed at improving productivity.
Workload and Working Environment	<ul style="list-style-type: none"> Transporting cup lumps to the auction venues imposes a heavy physical workload. Tapping is carried out almost daily, except on rainy days.
Successors and Career Choices	<ul style="list-style-type: none"> At rubber plantations closer to urban areas, younger generations (Generation Z) are moving into other industries, leading to an aging workforce. The price differential between natural rubber and palm oil influences employment preferences. At rubber plantations farther from urban areas, many individuals enter plantation work after graduating from high school.

Key Takeaways from the Visit

Issues and Observations

Through site visits and dialogue with multiple rubber plantations in Thailand and Indonesia, we gained a deeper understanding that differences in plantation workers’ working environment and levels of knowledge and technical skills have a direct impact on income and safety. In addition, we reaffirmed that natural rubber farmers are highly susceptible to changes in the natural environment and market conditions, which can give rise to human rights risks.

Moving Forward

While it is difficult for the Group to directly control changes in the natural environment and market conditions, it will continue to consider and advance initiatives that support productivity improvements at each plantation, thereby contributing to improved working conditions and the mitigation of human rights risks.

In addition, as challenges vary by country and region, we will continue site visits across a broad range of countries and regions to ensure an accurate understanding of local conditions.

Agricultural Technical Assistance Project for Smallholder Farmers

In 2025, with the aim of improving the traceability of natural rubber and enhancing the livelihoods of farmers in Jambi Province, Indonesia, the Group implemented a support project in collaboration with Halcyon Agri, a company engaged in the production and distribution of natural rubber. The project included assessments of the current conditions of natural rubber farmers and raw material distribution routes, training programs for farmers, and the provision of fertilizers free of charge.

Over the period from 2022 to 2025, we delivered fertilizer to a cumulative total of more than 1,000 farmers and supported appropriate production techniques through guidance on Good Agricultural Practices (GAP).

As a result of this project, it was confirmed that participating farmers achieved an increase in natural rubber yields of approximately 18% to 22%, along with an improvement in income of around 25%. Building on these outcomes, the Group plans to launch new projects in 2026 to expand the scope of its support to additional regions.



Plantation site



Rubber tapping



Transporting natural rubber



Dialogue with plantation workers



Evaluating Effectiveness

Evaluation of the Effectiveness of Initiatives Implemented in 2025

Developing Human Rights Action Plans at Manufacturing Sites

In 2025, we asked major overseas manufacturing sites (Group companies) to develop preventive action plans focused on key human rights issues identified by the Group and tailored to the circumstances at each site.

	Completed / No. of sites
Tire Business	8/8
Sports Business	3/3
Industrial Products Business	2/3

Status of Human Rights Assessments at Sales Sites

In 2025, we conducted assessments at domestic and overseas sales sites (Group companies) using a questionnaire to evaluate human rights risks.

	Completed / No. of sites
Tire Business	10/11
Sports Business	9/11
Industrial Products Business	3/4

Status of Grievance Mechanisms

The Group encouraged domestic and overseas Group companies to establish site-specific external grievance channels.

	Established / No. of sites
Internal grievance channels (2024 data)	33/42
External grievance channels	38/44

Issues Identified and Future Approach

Based on the implementation status described above, the Secretariat of the Human Rights Subcommittee identified key issues by taking into account feedback from human rights experts as well as international trends to determine the direction for future initiatives.

	Item	Review content	Future approach
1	Developing human rights action plans at manufacturing sites	While the human rights personnel at each site prepared the plans based on site-specific circumstances, variations were observed in the level of detail and scope of measures.	The Secretariat of the Human Rights Subcommittee plans to provide targeted, site-specific follow-ups to support sites where measures have not been sufficiently detailed.
2	Conducting assessments at sales sites	Analysis of the assessment results identified trends specific to sales sites, indicating the need for responses tailored to these characteristics.	Based on these site-specific trends, each site will develop a human rights action plan, consistent with the approach applied at manufacturing sites.
3	Status of grievance mechanisms	While progress has been made toward establishing site-specific external reporting channels, further enhancement is required to improve their effectiveness and credibility.	The Group will consider enhancing its grievance mechanisms to meet the eight effectiveness criteria set out in the UN Guiding Principles on Business and Human Rights.

Regarding our human rights initiatives, the Secretariat of the Human Rights Subcommittee oversees and coordinates activities across the Group and reports regularly to the Sustainability Promotion Committee. Through monitoring and reviews by management, the Committee continuously assesses the appropriateness of both the direction and the level of the Group’s human rights initiatives.

Strategic Targets of Initiatives

Basic Perspective

The Group 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 Group 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							
4) Confirm progress							
Subsidiaries	Production bases	Direct hiring	Enacting items 1–4 in the same manner as the Head Office				
		Indirect hiring	HRDD for foreign workers		Trials at Thai site	Develop at other sites	
	Sales locations						
Value chain (upstream)	Origin (natural rubber)						
	Suppliers (direct contracts)						
	Suppliers (indirect contracts)						
Value chain (downstream)	Logistics companies						
	Product sales companies						

Priority Initiatives in Fiscal Year 2026

Item	Content	Method	
Establishing governance systems	Consider integrating effective HRDD into existing operations at each site and business division.	Led by the Secretariat of the Human Rights Subcommittee, implement in collaboration with relevant departments.	
Human Rights Policy	Continue implementing education and awareness-raising activities related to human rights.	Conduct seminars, workshops, and small-group study sessions.	
Grievance mechanisms	Enhance grievance mechanisms to improve accessibility, effectiveness, and trust.	Develop enhancement measures, set priorities, and formulate implementation plans.	
HRDD	Natural rubber	Continue promoting HRDD in the natural rubber supply chain.	Conduct site visits and dialogues at plantations and processing facilities in Thailand, Indonesia, and Côte d'Ivoire.
	Manufacturing sites	Continue promoting HRDD at each manufacturing site.	While respecting site-level autonomy, the Secretariat of the Human Rights Subcommittee will monitor progress.
	Sales sites	Promote HRDD initiatives at each sales site.	Develop site-specific action plans to prevent and mitigate human rights risks.
	Logistics companies	Assess human rights risks at logistics-related Group companies.	Conduct an assessment using structured questionnaires.
	Suppliers	Engage suppliers, primarily Tier 1 suppliers, in HRDD efforts.	Implement through collaboration between the Secretariat of the Human Rights Subcommittee and relevant departments

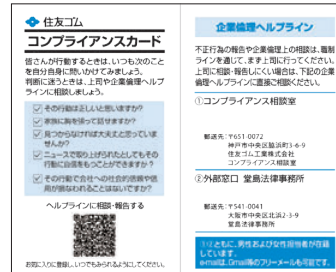
Establishing Grievance Mechanisms

Basic Perspective

Our 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.

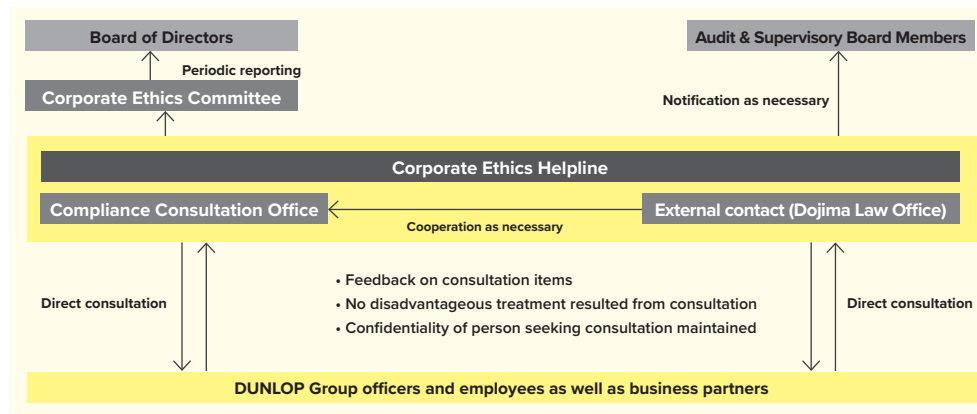
☑ Compliance



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.



Issues with the Existing Grievance Mechanisms

Current Issues

In fiscal year 2025, the Group advanced efforts to understand the status of and enhance whistleblowing and reporting channels across domestic and overseas Group companies. However, when assessed against the eight effectiveness criteria for grievance mechanisms set out in the UN Guiding Principles on Business and Human Rights, these mechanisms had not yet fully met all criteria, and further improvements in effectiveness and trust remain a key challenge.

Approach to Addressing Issues

Going forward, the Group will review examples from other companies that have established and operate grievance mechanisms that meet the eight effectiveness criteria of the UN Guiding Principles on Business and Human Rights and define the target state (To-Be) that the Group should aim to achieve. Based on this, the Group will analyze the gap between the current state (As-Is) and the target state, prioritize effective measures to enhance its grievance mechanisms, and proceed with the development of an implementation plan for fiscal year 2026.

Topics

Grievance Desk for Migrant Workers at Manufacturing Sites in Thailand

In fiscal year 2025, members of the Human Rights Subcommittee conducted site visits to our manufacturing sites in Thailand and confirmed that grievance mechanisms for migrant workers had been established and appropriately communicated.

Situation of Migrant Workers in Thailand

In Thailand, against the backdrop of a declining labor force, a large number of migrant workers are employed. Thus, at the Group's manufacturing sites, workers from Myanmar and Cambodia are engaged in operations.

Support in Native Languages

With the aim of enhancing "accessibility," as indicated in UN Guiding Principles on Business and Human Rights, the Group provides migrant workers with information in their native languages. In addition, to improve convenience and ease of access, grievance channels that can be accessed via smartphone have been established.

Potential for Rollout to Other Sites

The Group plans to roll out this initiative to other global sites, including Japan.



Distributing information on grievance channels in migrant workers' native languages to those employed at manufacturing sites in Thailand.

Stakeholder Engagement

Basic Perspective

The Group believes that dialogue with stakeholders, particularly rights holders, is essential to enhancing human rights literacy and risk awareness, as well as to improving the effectiveness of its human rights initiatives. Insights and information obtained through such dialogue are used to examine, review, and refine our initiatives.

In fiscal year 2025, the Group proactively created opportunities for dialogue with a wide range of stakeholders, including customers, shareholders and investors, employees, business partners, human rights experts, and human rights officers from other companies. Through these engagements, the Group deepened its understanding of corporate policies and responses, as well as stakeholder expectations and requests. By fostering mutual understanding, the Group has reaffirmed the importance of collaboration and cooperation in addressing human rights issues.

Going forward, the Group will continue to engage in dialogue and collaboration with stakeholders to advance effective initiatives that respect human rights.

Stakeholder Engagement

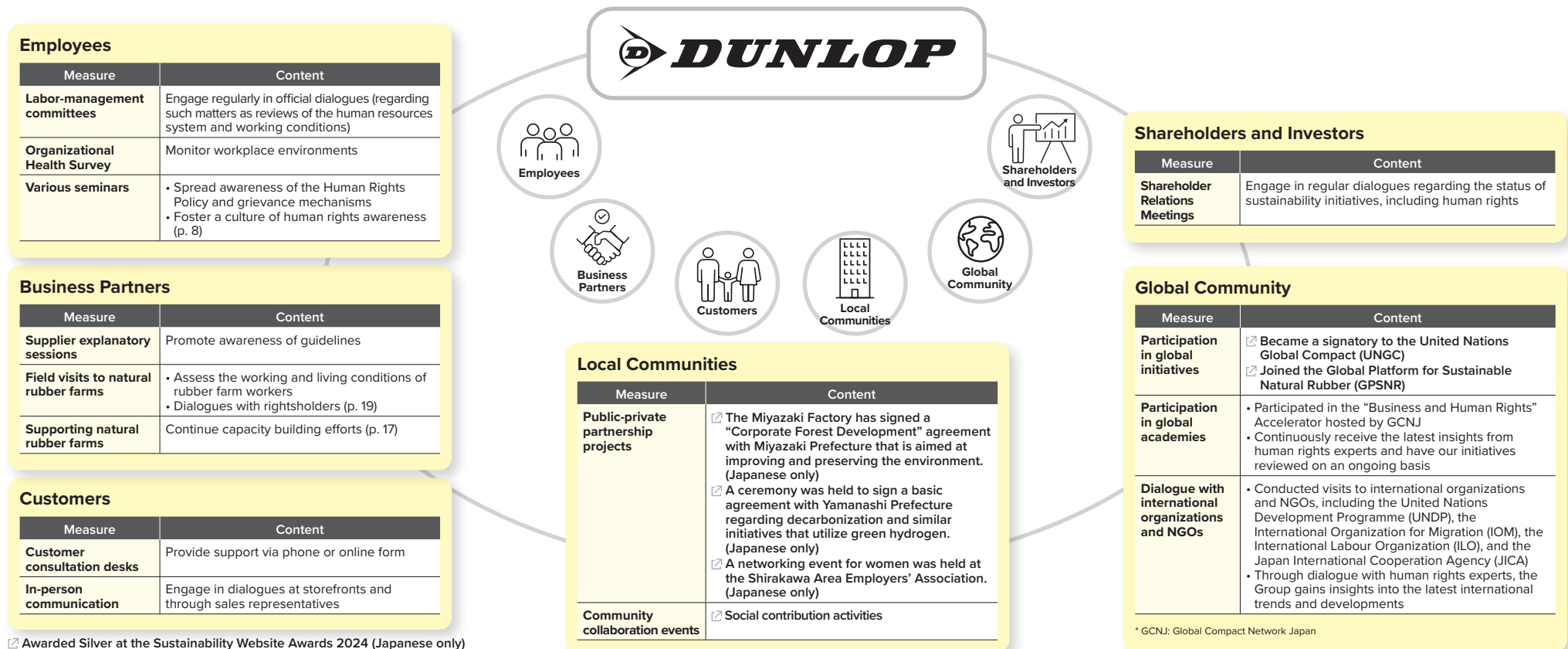
Reference Information

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



Awarded Silver at the Sustainability Website Awards 2024 (Japanese only)

* GCNJ: Global Compact Network Japan

Moving Forward (Expert Review)



Partner, Mori Hamada & Matsumoto/
Managing Partner, Mori Hamada New York
Attorney at Law

Mr. Hideaki Roy Umetsu

Professional Background

He has extensive experience advising Japanese companies on domestic and cross-border M&A, expansions into emerging markets, compliance matters in developing countries, and the management of overseas subsidiaries. He has also handled numerous matters related to Business and Human Rights involving Japanese companies.

In the field of Business and Human Rights, he has been engaged in this area from an early stage and have, over many years, actively contributed through information dissemination and continuous support and advisory services. This includes assisting Japanese companies with human rights due diligence (HRDD), as well as providing guidance on corrective remediation measures when human rights issues are identified.

He has also been involved in Business and Human Rights projects with international organizations such as the United Nations Development Programme (UNDP).

He serves as a Steering Committee Member of the Business and Human Rights Lawyers Network. He graduated from the Faculty of Law at the University of Tokyo and from the University of Chicago Law School. He was admitted to the bar in Japan in 2004 and in New York in 2010. Since 2024, he has served as the representative of the New York office of Mori Hamada & Matsumoto.

Upon Reading the Human Rights Report

It is reassuring to see the sincere manner in which the company is engaging with various Business and Human Rights challenges and advancing its initiatives in this area. At the same time, deep respect is owed to those across departments and operational sites who are committed to promoting these efforts.

In particular, these initiatives go beyond formal measures such as the development of policies and organizational frameworks. Notable efforts include on-site visits to natural rubber plantations in Indonesia and elsewhere, engaging in direct dialogue with plantation workers to gain a concrete understanding of human rights risks on the ground, and seeking to reflect those insights in company measures. Furthermore, initiatives such as the Human Rights Global Summit—aimed at sharing human rights risks across manufacturing sites, including overseas operations, and enhancing human rights due diligence on a cross-functional basis—demonstrate a clear commitment to advancing more substantive and practical approaches. Such efforts represent important progress in addressing Business and Human Rights in a meaningful and effective manner.

Connecting Initiatives to the Actual Improvement and Prevention of Human Rights Issues

Efforts relating to Business and Human Rights derive their true significance only when they lead to the actual mitigation and prevention of adverse impacts arising from business activities. From this perspective, it is important to remain mindful of how past initiatives have addressed specific human rights risks affecting particular rights-holders, and in what ways such risks have been improved or prevented.

It is essential to ensure that the implementation of various measures does not become an end in itself, but rather remains grounded in clear understanding of their underlying purpose. This requires ongoing evaluation of whether such initiatives are in fact contributing to the mitigation and prevention of human rights risks.

Looking ahead, it will be important to share within the organization, based on concrete measures, how specific initiatives have led (or have not led) to the mitigation and prevention of particular human rights risks. Furthermore, proactively disclosing such tangible outcomes in the Human Rights Report and other external communications, not only through quantitative data, but also through qualitative insights and illustrative case examples, will help foster greater understanding among both internal and external stakeholders. In turn, this is expected to further strengthen momentum for advancing these initiatives.

On the Grievance Mechanism

Although identified as a future challenge, systems for receiving complaints and grievances related to adverse impacts arising from business activities and linking them to remedy are, together with human rights due diligence, as akin to the “the wheels of a car,” both of which are essential.

While existing helplines are currently being utilized, it is important to consider how grievance mechanisms should be structured so that they can function effectively in addressing a range of human rights risks. This includes examining how reporting channels should be established, how received complaints and grievances should be handled, and how they can be translated into concrete actions that lead to the mitigation and prevention of human rights risks. Careful consideration of these aspects will be necessary in order to establish appropriate and effective mechanisms.

Furthermore, it is not sufficient merely to establish such channels. It is equally important to ensure that they are actively and effectively utilized in practice, and that complaints and other reports received through these mechanisms lead to tangible outcomes, including the actual mitigation and prevention of specific human rights risks.

Once again, I hold sincere respect for all of your efforts to date, together with the hope that continued efforts will lead to further improvement of a broader range of human rights issues.

Third-Party Remarks

We would like to express our sincere gratitude to Mr. Umetsu for his highly valuable comments on our Group’s efforts to respect human rights. His recognition of our substantive initiatives provides great encouragement to those who promote these efforts on a daily basis. These include the field visits to natural rubber plantations in the Jambi area of Indonesia and dialogues with plantation workers, as well as the cross-functional sharing of human rights risks and advancement of human rights due diligence across overseas bases and other operations through the Human Rights Global Summit, held with the support of IOM.

At the same time, he highlighted the importance of ensuring that the implementation of measures does not become an end in itself. He emphasized the need to verify how human rights risks affecting rights-holders have been concretely improved or prevented, and to proactively disclose such outcomes both internally and externally from both quantitative and qualitative perspectives. He further underscored the need to enhance grievance mechanisms into systems that function effectively—alongside human rights due diligence as the “the wheels of a car”—and that lead to concrete remedy.

Human rights challenges are becoming increasingly complex and diverse across the supply chain against the backdrop of changes in the international landscape, climate change, demographic shifts, and other factors. While we are encouraged by the progress of the natural rubber smallholder support project, it is important to remain constantly mindful of the fundamental issue of “what we are doing this for.” Through our business activities, we will continue to fulfill our responsibility to respect human rights and build relationships of trust with our stakeholders, while continuing to create “joy and well-being.”



Sumitomo Rubber Industries, Ltd.
Sustainability Promotion Department Head

Takayuki Nagase

Metrics (Social Data)

Key Themes	Metrics	Unit	FY2024	FY2025	Notes
			Results	Results	
Health and safety	Absenteeism	%	0.85	0.82	DUNLOP (Sumitomo Rubber Industries, Ltd.)
	Occupational injury frequency rate	%	0.13	0.26	
Coexistence with regional communities	Total amount of Sumitomo Rubber Industries CSR Fund subsidy	Millions of yen	13.90	14.62	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	37,995	37,671	
	Number of employees (non-consolidated basis)	Persons	7,636	7,675	DUNLOP (Sumitomo Rubber Industries, Ltd.)
	Number of overseas employees	Persons	25,988	25,557	
	Average years of service (all employees)	Years	14.6	14.4	DUNLOP (Sumitomo Rubber Industries, Ltd.)
	Women	Years	10.7	10.9	DUNLOP (Sumitomo Rubber Industries, Ltd.)
	Men	Years	14.7	14.8	DUNLOP (Sumitomo Rubber Industries, Ltd.)
	Average age (all employees)	Years old	40.8	40.2	Regular employees of DUNLOP (Sumitomo Rubber Industries, Ltd.) on a non-consolidated basis
	Women	Years old	40.3	40.6	DUNLOP (Sumitomo Rubber Industries, Ltd.)
	Men	Years old	40	40.2	DUNLOP (Sumitomo Rubber Industries, Ltd.)
	Employee turnover rate	%	2.3	2.3	Excludes retirements at the mandatory retirement age. DUNLOP (Sumitomo Rubber Industries, Ltd.)
Diverse workstyles	Average monthly working hours per employee	Hours	163.5	163.2	
	Average monthly overtime hours per employee	Hours	22.7	23.1	
	Number of annual paid leave days taken	%	86.8	88.1	
	Monthly average training hours per employee	Hours	15	12	DUNLOP (Sumitomo Rubber Industries, Ltd.)
	Average wage gap between men and women				
	Permanent employees (full-time)	%	73.6	76.5	Women's wages as a proportion of men's wages, with men's wages set at 100 DUNLOP (Sumitomo Rubber Industries, Ltd.)
	All directly employed employees	%	67.6	74.1	Women's wages as a proportion of men's wages, with men's wages set at 100 DUNLOP (Sumitomo Rubber Industries, Ltd.)
	Childcare leave usage rate				
	Maternity leave usage rate	%	100	103.4	As employees who already have children are also eligible to take this leave, the rate may exceed 100% depending on the calculation.
Paternity leave usage rate	%	105.5	115.3	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%.	
Advancing diversity	Ratio of women to the total number of full-time employees	%	12	13	DUNLOP (Sumitomo Rubber Industries, Ltd.)
	Ratio of women among Directors	%	17.6	20	
	Ratio of women to the total number of managers	%	5	5.9	DUNLOP (Sumitomo Rubber Industries, Ltd.)
	Ratio of women to the total number of non-full-time employees	%	19.4	19.3	DUNLOP (Sumitomo Rubber Industries, Ltd.)
	Ratio of women to the total number of new employees	%	19	15.5	DUNLOP (Sumitomo Rubber Industries, Ltd.)
	Ratio of foreign employees	%	0.5	1.1	DUNLOP (Sumitomo Rubber Industries, Ltd.)
	Ratio of employees with disabilities to the total number of employees	%	2.61	2.49	Including special subsidiaries

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

DUNLOP Group Human Rights Policy

The “DUNLOP 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 DUNLOP 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 DUNLOP 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 DUNLOP 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.

March 26, 2026

Sumitomo Rubber Industries

President and CEO, Representative Director, Yasuaki Kuniyasu



^{*1} Code of Conduct

^{*2} The Corporate Ethics Helpline

Our Efforts to Address Individual Human Rights Issues

Diversity and Individual Dignity

We respect the diversity, privacy and uniqueness of each individual. 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

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.

