

The Sumitomo Electric Group Policy on Human Rights

The Sumitomo Electric Group, in accordance with the Sumitomo Spirit and the Sumitomo Electric Group Corporate Principles, shall strive to be a group of companies worthy of society's trust by conducting business activities in an honest manner.

As we continue to develop together with the global community, the Sumitomo Electric Group recognizes that all of its business activities must be based on respect for human rights. The Sumitomo Electric Group will work ethically and responsibly for the respect of human rights ensuring that our entire group will uphold this standard.

1. Stance

The Sumitomo Electric Group hereby sets "The Sumitomo Electric Group Policy on Human Rights" (hereinafter referred to as "the Policy") to promote initiatives for respect to human rights. The Policy shall be guided by the following documents: "International Bill of Human Rights" (the Universal Declaration of Human Rights and the International Covenants on Human Rights) that sets forth fundamental human rights to be enjoyed by all people in the world; the "ILO Declaration on Fundamental Principles and Rights at Work" set forth by the International Labour Organization (ILO) which stipulates basic rights at work i.e. freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour and the elimination of discrimination in respect of employment and occupation; and the "Guiding Principles on Business and Human Rights" of the United Nations. The Policy represents the Sumitomo Electric Group's commitment to respecting human rights based on The Sumitomo Spirit and The Sumitomo Electric Group Corporate Principles as described in the Code of Conduct.

2. Scope of Application

The Policy will apply to all executives and employees of the Sumitomo Electric Group (all employees including executives, permanent employees and contract employees.) The Sumitomo Electric Group also expects all business partners related to its business activities to comply with the Policy.

3. Responsibility to Respect Human Rights

The Sumitomo Electric Group will aim to fulfil its responsibilities by ensuring that its business activities respect and enhance human rights. In the event our business activities should make any adverse impact on human rights, it shall be handled appropriately for correction.

Furthermore, we expect our business partners and stakeholders to respect the same standards of human rights as the Sumitomo Electric Group, to prevent violation and correct any breaches.

① Human Rights Due Diligence

To fulfill our responsibilities in regard to respect for human rights, the Sumitomo Electric Group will establish a system of human rights due diligence through the implementation of "Guiding Principles on Business and Human Rights" of the United Nations, and implement this in an ongoing manner. Human rights due diligence includes specifying and evaluating negative impacts imposed potentially or actually and taking measures to prevent or mitigate such risks.

② Remedy

In the event the Sumitomo Electric Group's business activities result in violation of human rights or it becomes clear that it was involved in making such adverse impact, we will provide for an appropriate remedy.

③ Training and Education

The Sumitomo Electric Group will provide appropriate training and education to its executives and employees.

④ Compliance with Applicable Laws and Regulations

The Sumitomo Electric Group will comply with the laws and regulations of all countries where it conducts its business activities. In the event that we face contradiction between internationally recognized human rights standards and the laws of the relevant country, the Sumitomo Electric Group will pursue ways to honor the principles of internationally recognized human rights.

⑤ Dialogue and Consultation

The Sumitomo Electric Group, in various efforts under the Policy, will make use of the independent and external expertise concerning human rights and will engage sincerely in holding dialogues and consultation with the stakeholders.

⑥ Information Disclosure

The Sumitomo Electric Group will disclose the progress of the initiatives regarding human rights based on the Policy on its website and reports.