SUMITOMO ELECTRIC GROUP

Sumitomo Electric Europe Ltd

Statement on Slavery and Human Trafficking for Financial Year 2023/2024

Introduction

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and outlines the measures being taken by **Sumitomo Electric Europe Ltd** (hereinafter "**SEEL**") to mitigate the potential risk of modern slavery and human trafficking ("**Modern Slavery**") occurring in any part of the SEEL business and its supply chains in the **2023/2024** financial year ("FY").

Our business and supply chain

SEEL is a subsidiary of Sumitomo Electric Industries Ltd ("**SEI**") which itself forms part of the Sumitomo Electric Group ("**SEG**"). SEI is a Japanese manufacturer of electrical wire, optical fibre cables, electronics and hard metal products established in 1897. SEI's headquarters are in, Osaka, Japan. SEI's shares are listed in the first section of the Tokyo, Nagoya Stock Exchanges, and the Fukuoka Stock Exchange.

SEG, in accordance with its corporate philosophy which consists of the Sumitomo Spirit and the Corporate Principles, strives to be a group of companies worthy of society's trust by conducting its business activities in an honest manner. The Sumitomo Spirit encourages all employees, officers and directors ("**Employees**") to:

- do their best not only in business, but in every aspect of their lives;
- place importance on integrity and good management; and
- never sacrifice integrity for easy profit.

Additionally, each company of SEG shall commit to drive their business based on key corporate principles:

- Offer the very best goods and services to satisfy customer needs;
- Build technical expertise, realise changes and strive for consistent growth;
- Contribute to creating a better society and environment, with a firm awareness of our social responsibility;
- Maintain high corporate ethics and strive to become a company worthy of society's trust; and
- Nurture a lively corporate culture that enables employee self-improvement.

SEEL is responsible for sales and support in the EMEA region of a range of products manufactured by other SEG companies. The product range includes: optical fibre, optical fibre cable, fusion splicers, optical transmission components, microwave components, electric power transmission cables and components for battery electric vehicle charging stations. As of August 2024, SEEL has 81 employees based across the UK, Italy, Czech Republic, Sweden, Finland and the Netherlands.

SEEL's global supply chain operates across 7 countries and it sells its products to more than 50 countries across the EMEA region, excluding any countries under sanction. Its consolidated turnover is approximately GBP 93.4M.

Corporate Awareness and Policies

The Corporate Social Responsibility Committee, formed of senior management from SEG, is committed to ensure the best strategy for supporting and advancing human rights in all the communities where SEG operates (the "**CSR Committee**"). Each year the CSR Committee Annual Report describes the measures taken by SEG to further strengthen its corporate social responsibility and SEG complies with and expects its suppliers to comply with the Corporate Social Responsibility Basic Policy.

In parallel to the CSR Committee programme, SEG Global Code of Conduct ("**Code of Conduct**") supports the CSR Committee's action by communicating SEG's commitment to human rights to all Employees. SEG Code of Conduct makes clear that all forms of Modern Slavery are unacceptable to SEG. SEG Code of Conduct, available in over 30 languages, requires all Employees to make a personal commitment to do business in accordance with the Sumitomo Spirit. SEG Code of Conduct also makes clear that it is expected that all business partners should act in a way that is consistent with the principles of the Code of Conduct.

Awareness and understanding of the Code of Conduct is promoted to Employees by face-to-face training, e-learning and effective internal communication.

The SEG Supplier Code of Conduct ("**SCoC**") replaced the CSR Procurement Guidelines in 2021. SEG seeks to do business with suppliers that share our commitment to integrity and to conducting business in compliance with the law. The SCoC is applicable to SEG suppliers globally, including SEEL's suppliers. Within SEEL, the SCoC has been rolled out to existing customers/suppliers and is included as a contractual term in all new SEEL originated commercial contracts: (i) to ensure suppliers' commitment to compliance, including to preventing Modern Slavery and other Human Rights violations and (ii) to enable the SEEL to work with the supplier to address identified concerns or provide SEEL a right to terminate any contract with its suppliers that fails to respect the SCoC provisions. SEEL also makes every effort to include compliance with the SEG SCoC as a contractual term in contracts proposed by third-parties.

SEG also has in place a global Policy on Human Rights (the "**Human Rights Policy**") and a commitment to Human Rights Due Diligence which is guided by the "International Bill of Human Rights", the "ILO Declaration on Fundamental Principles and Rights at Work", and the "Guiding Principles on Business and Human Rights" of the United Nations to respond to the various needs of our stakeholders and to show our commitment to respecting human rights that abide by international standards.

The Human Rights Policy reflects SEG's commitment to drive continuous improvements within our business and details its fundamental principles with regards to the protection of human rights. The Human Rights Policy applies to SEEL as a subsidiary of SEG. SEG also expects all business partners related to its business activities to comply with the Policy.

Commercial practices (with third-parties)

In addition to the high-level policies, day-to-day commercial practices have been developed which require the SEEL's suppliers to agree to and comply with legal compliance and ethical conduct terms, including, by accepting the SCoC in commercial contacts, or adhering to enhanced Modern Slavery clauses. Our standard Modern Slavery clauses continue to be reviewed on a periodic basis to ensure they remain robust and fit for purpose.

As part of the SEG Compliance Programme, new and current business partners must go through the Human Rights Due Diligence process in order for SEG to be assured that the business partners it engages with meet the required standards of ethical conduct. To ensure that SEG's initiatives are promoted in line with the Human Rights Policy, adverse media report scanning and fact-finding investigations are conducted regularly of our stakeholders, including domestic and overseas affiliates.

Since the last financial year, SEG has advanced its efforts in alignment with the Corporate Sustainability Reporting Directive in the EMEA region. In addition, SEG is now in the process of formulating guidance and training for its employees to ensure compliance with the requirements of the EU Corporate Sustainability Due Diligence Directive and we have also partnered with an external vendor (IntegrityNext) to further strengthen our supply chain and human rights due diligence. This collaboration will enhance our ability to monitor and mitigate risks related to modern slavery within the SEEL supply chain.

Risk Assessment

In the last financial year, SEG took proactive steps to reinforce our commitment to ethical labour practices by engaging an independent consultant to review our compliance with SEG's Global Migrant Worker Policy, including that of SEEL. This comprehensive review, completed in November 2023, involved direct interviews with migrant workers and confirmed that the risks related to child labour and forced labour within our operations remains low.

Training

Training is provided regularly within the SEEL to build awareness of unethical conduct including Modern Slavery. All employees at SEEL receive ongoing training on the SEG Code of Conduct which, includes express references to the Human Rights Policy.

SEG encourages continuous dialogue between their subsidiaries to heighten awareness of the risk of Modern Slavery and to mitigate the risk where possible.

Whistleblowing/Speak up

SEG continues to promote a 'speak up' culture that encourages a workplace where Employees feel comfortable raising concerns about unsafe, unethical or unlawful practices. This 'speak up' culture is facilitated, in part, by an external whistleblowing hotline (operated by Navex), with an option of anonymity, for Employees or business partners to raise their concerns. All reports raised internally or via the external hotline are taken seriously and follow a documented procedure for review and/or investigation in order that the concerns are addressed appropriately. The Code of Conduct and Speak Up Policy prohibit retaliation against those that raise concerns of unsafe, unethical or unlawful practices.

Reports raised internally or via the external hotline are used to measure the effectiveness of training and the levels of awareness and understanding of Employees of unethical practices including on Modern Slavery. In addition, self-assessment questionnaires asking Employees to share their thoughts about the possible risks of Modern Slavery within the SEEL business and supply chains shall aid in developing the true risk exposure.

SEG has also committed to prioritising investigations related to human rights, modern slavery and employee issues with a view to completing such investigations in the shortest time possible and in FY 2023-2024 such cases have generally been investigated, resolved and closed within 1-3 months.

Intent

SEG recognizes its responsibility to respect and enhance human rights and is committed to developing and improving the knowledge base of its Employees. It remains committed to continue working ethically and responsibly for the respect of human rights ensuring that each company of SEG, including SEEL, will uphold this standard. SEG also intends to progress the corporate sustainability due diligence activity adding a risk categorization for human rights and work alongside recruitment companies to ensure they understand our Human Rights Policy, recruitment principles and mitigate Modern Slavery risks. SEG continues to monitor and improve its existing policies and procedures to ensure their effectiveness.

SEEL is similarly committed to continuing the encouragement of its suppliers in assessing their own business and supply chains for Modern Slavery and intends to work with SEG to formulate a SCoC compliance audit strategy of it suppliers in order to reduce the risk of Modern Slavery materialising in SEEL's supply chain.

This statement has been approved by SEEL's management team.



Masakazu Watanabe

Managing Director

Date: 15/09/2024