

SUMITOMO ELECTRIC GROUP

Sumitomo Electric Europe Ltd

Statement on Slavery and Human Trafficking for Financial Year 2025-2026

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Sumitomo Electric Europe Ltd

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 prevent modern slavery and human trafficking ("**Modern Slavery**") in our business and supply chains during the financial year 2025-2026.

SEEL is part of the larger Sumitomo Electric Group ("**SEG**") of companies. 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.

SEG recognises that ethical labour practices, including modern slavery prevention, are fundamental to the group's success, sustainability, and integrity and have outlined labour and employment activities on the group [CSR portal](#). These are not just aspirational commitments, but policies which demonstrate our practical processes in ensuring an ethical workplace is a reality.



The [Sumitomo Spirit](#) encourages all employees, officers and directors ("**Employees**") to:

- **Banji-nissei** - do their best not only in business, but in every aspect of their lives;
- **Shinyo-kakujitsu** - place importance on integrity and good management; and
- **Fusu-furi** - 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.

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1. Organisational Structure, Business & Supply Chains

Our Business

SEEL is a subsidiary of Sumitomo Electric Industries Ltd ("**SEI**") which itself forms part of the Sumitomo Electric Group. 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.

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 and electric power transmission cables. As of August 2026, SEEL has around 73 employees based across the UK, Italy, Czech Republic, Sweden, Finland and the Netherlands.

Supply Chain Overview

SEEL's global supply chain spans 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 97.4M. SEEL's supply chains encompass multiple tiers, including direct and indirect suppliers of components, and services such as HR, facilities management, and logistics.

We actively map our supply chains, which includes understanding recruitment practices and sourcing of migrant workers.

2. Organisational Policies

Corporate Governance & Oversight

The Corporate Social Responsibility Committee ("**CSR Committee**"), formed of senior management from SEG, is committed to ensure the best strategy for supporting and advancing human rights, including abating modern slavery risks, in all the communities where SEG operates. Each year the [CSR Committee](#) 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](#).

Code of Conduct & Supplier Code of Conduct

Our SEG [Global Code of Conduct](#) prohibits all forms of modern slavery and is available in over 30 languages. It sets clear standards for all employees and business partners. Awareness and understanding of the Code of Conduct is promoted to Employees by face-to-face training, e-learning and effective internal communication.

The [Supplier Code of Conduct](#) ("**SCoC**"), adopted in 2021, contractually binds suppliers to upholding ethical labour standards, human rights, and zero tolerance for modern slavery. Non-compliance can result in contract termination.

Human Rights Policy & Due Diligence

Guided by the UN Guiding Principles and international standards, [SEG's Global Policy on Human Rights](#) commits to continuous improvement and thorough due diligence, integrating these standards into decision-making and supplier relationships. 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.

3. Assessing and Managing Risk

Risk Assessment Process

SEG uses a risk assessment framework that covers all tier 1 and high-risk tier 2 parties of our supply chain, including suppliers, subcontractors, and support functions. Risk assessments undertaken have shown there is no evidence of forced labour in our workforce or labour supplier chain and no incidences of child labour.

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Risk Prioritisation and Management

Risk is prioritised monitoring regulatory demands and using geographic, sectoral, and labour vulnerability factors. We engage local experts, NGOs, and legal advisors to validate findings and plan actions as necessary.

We have also developed day-to-day commercial practices which support risk management; SEEL requires high risk suppliers to agree to and comply with legal compliance and ethical conduct terms, including, by accepting the SCoC in commercial contracts, or adhering to enhanced modern slavery clauses.

Incident Example and Remediation

Last year, no incidents were identified. SEG remains committed to continuous improvement, robust oversight, and ensuring that all operations and partners uphold our ethical standards and legal obligations.

4. Due Diligence in Relation to Modern Slavery

Supplier Due Diligence

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 high-risk stakeholders, including domestic and overseas affiliates. Where modern slavery indicators are flagged, we carry out enhanced checks. We monitor higher-risk suppliers through regular reviews and follow-ups to ensure compliance and drive continuous improvement across our supply chain.

We have encountered suppliers with history of ethical labour concerns, and in such relationships, ensured the inclusion of enhanced modern slavery clauses and sought non-negotiable compliance with the SCoC. All prospective and existing suppliers undergo human rights due diligence and must comply with SCoC requirements. Contractual clauses allow termination for modern slavery violations.

During FY 2025-2026, SEG has:

- Continued to develop internal expertise and alignment with the Corporate Sustainability Reporting Directive in the EMEA region and provided training to senior management.
- Advanced its Supply Chain Due Diligence programme, including the evaluation of enhanced due diligence processes and the potential implementation of a dedicated Due Diligence Policy to support responsible sourcing and supplier oversight.
- Continued to advance its relationship with external vendors, strengthening supply chain risk monitoring through the use of technology solutions, including Assent, to support the identification and management of risks associated with forced labour and compliance requirements.
- Continued to improve supply chain transparency and risk assessment processes to support the identification of higher-risk suppliers, sectors and geographic areas.
- Incorporated Human Rights Due Diligence initiatives into the Group's CSR Procurement Assessment. In FY2025, SEG conducted assessments for 822 companies, and no specific issues were identified.

Monitoring and Audits

We monitor supplier compliance via audits, media screening, and performance reviews, with worker interviews and third-party verifications for accuracy. Specifically, the SEG HR team conducts periodic reviews of its supply chain via a questionnaire to its group companies designed to scan risks around unethical labour practices and modern slavery (including child labour, forced labour, and migrant worker issues) in the labour supply chain. When risks are identified the business concerned is scrutinised further.

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Grievance and Remediation Mechanisms

SEEL encourages suppliers to establish grievance channels. Internally, an externally operated whistleblowing hotline (Navex) provides protected channels for employees and business partners to report concerns. We regularly analyse and periodically audit our whistleblowing reports to track trends, remedial action and develop more-focused training on key issue areas.

5. Training

Training is provided regularly within SEG to build awareness of unethical conduct including human rights abuses, bullying and harassment and modern slavery. All employees at SEG receive ongoing training on the SEG Code of Conduct which, includes express references to the Human Rights Policy, anti-harassment training, whistleblowing and our new workplace culture training in the EMEA region. Customised training is provided to employees operating in relevant risk areas. During FY 2025-2026, SEG has rolled out a new e-learning training content provider, offering expanded content on human rights, modern slavery, ethics and compliance topics.

6. Monitoring and Evaluation: Understanding and Demonstrating Effectiveness

Performance Indicators

KPIs include:

- Percentage of suppliers signed up to SCoC. Result = As of this FY 2025-26, the majority of suppliers, apart from a few approved exceptions, are bound by the SCoC.
- Number of due diligence assessments conducted. Result = 198 entities were subject to due diligence risk assessments which includes looking at modern slavery and forced labour issues.
- Number and outcome of whistleblowing reports related to modern slavery. Result = 0
- Targets to achieve the Mid-term Management Plan 2025:
 - Completion of Executive Training Program: 100 employees/3 years
 - Total hours of training programs: 20.0 hours / annually per headcount

Continuous Improvement

SEG reviews and updates policies and practices every year, drawing on risk assessments, incident outcomes, stakeholder feedback, and evolving legal standards (such as the EU Corporate Sustainability Due Diligence Directive). Our standard modern slavery clauses continue to be reviewed on a periodic basis to ensure they remain robust and fit for purpose.

During FY 2025-2026, SEG has committed to reviewing and updating its Supplier Code of Conduct and Global Code of Conduct to ensure alignment with the CSRD, and to reinforce expectations regarding human rights, ethical business practices and responsible supply chain management. In addition, SEG has commenced a review of its Human Rights Policy to ensure it remains aligned with evolving legal requirements and international standards and stakeholder expectations.

For FY 2025-2026, SEG is focusing on strengthening our approach to human rights and modern slavery risk management, including updating our Human Rights Policy, progressing our Supply Chain Due Diligence processes, further develop employee training through our new training provider and expanded learning content, and continue to explore the use of technology solutions in relation to identifying supply chain risks.

Following the establishment of a framework in FY2024 to check the status of critical human rights risks (child labour, forced labour, and inappropriate usage of migrant workers) across the group companies, SEG conducted annual internal self-assessments (where it focused on child labour, forced labour, and migrant workers) in FY 2025. The results were:

- No finding of employing children (workers under 15 years old);

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- No finding of forced labour (such as restriction on workers' behaviour, debt bondage, or forced internal deposits); and
- Compliance with internal rules regarding employment of migrant workers (internal rules such as no hiring fees, no fees to be borne by the worker, no holding passports by the company, employment contracts to be signed in a language which the worker understands, etc.).

In addition, during FY 2025-2026, SEG's Global HR Department incorporated dedicated forced labour compliance questions into its annual self-assessment process. This exercise helps raise awareness and provides assurance that key controls are in place, including safeguarding workers' freedom of movement, preventing excessive monitoring, prohibiting debt bondage, and ensuring employment is not conditional on worker deposits or other financial obligations.

7. Whistleblowing and Speak up Culture

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. The SEG Code of Conduct and Whistleblowing Policy prohibit retaliation against those who 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.

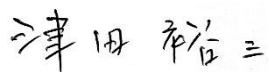
SEG has also committed to prioritising investigations related to human rights, modern slavery and employee issues with a view to completing such investigations in the shortest time possible. In FY 2025-2026 there were no reported concerns of modern slavery.

8. Intent and Commitment

SEG and SEEL is steadfast in its responsibility to respect and strengthen human rights across its global operations and supply chains; and we also remain committed to supporting suppliers in assessing and addressing modern slavery concerns in their business and supply chains.

Looking ahead, SEG continues to strengthen its approach to identifying, preventing and mitigating the risks of forced labour and modern slavery across its operations and supply chains. As part of its medium to long-term management strategy, SEG embeds responsible business practices and human rights considerations into its sustainability initiatives and communicates its progress to internal and external stakeholders through its *Integrated Report*. Further details are available in the *Mid-term Management Plan 2025*, which can be accessed here: [Mid Plan 2025](#). The plan outlines the key objectives, targets and actions that support SEG's commitment to ethical business conduct, supply chain due diligence and respect for human rights.

This statement has been approved by the SEEL management team.



Hirokazu Tsuda

Managing Director

Date: 14 Sep 2026