

Sumitomo Corporation Group

Slavery and Human Trafficking Statement for the Fiscal Year 2020

Sumitomo Corporation (SC) Group is committed to improving its practices to combat modern slavery and human trafficking. This statement has been published in accordance with [the UK Modern Slavery Act 2015](#) and constitutes SC Group's modern slavery and human trafficking statement for the fiscal year 2020 ended March 31, 2021. The statement has been approved by the board of directors of SC as the parent company of SC Group every year. This statement was approved by the board of directors of SC on August 30, 2021.

Background and organisational structure

SC Group is an integrated corporate group committed to business activities in a wide range of industries with over 130 offices and subsidiaries in over 60 countries and a network of over 900 group companies worldwide. With its global network and based on trust from companies in various industries and from consumers, SC Group engages in multifaceted business activities by making the most of its integrated corporate strength. These business activities include sales of a variety of products and services within Japan, import and export, trilateral trade, and domestic and international business investments. SC Group employs over 70,000 people.

For more information on SC Group's business overview, please visit the following link:

<https://www.sumitomocorp.com/en/jp/about>

Steps taken to ensure that modern slavery and human trafficking are not taking place in SC Group's business and supply chains

At the core of SC Group lies [Sumitomo's Business Philosophy](#), which has been passed down and followed faithfully for more than 400 years since Masatomo Sumitomo (1585-1652) had founded. [Our Corporate Mission Statement \(Management Principles and Activity Guidelines\)](#) is based on this philosophy and represents SC Group's fundamental and ultimate value standard. In the Corporate Mission Statement, it clearly states that SC Group respects the personality of each individual and places prime importance on integrity and sound management.

We also identified our [“Six Material Issues to Achieve Sustainable Growth with Society”](#) in 2017, a set of social issues that SC Group regards as important and should prioritize addressing through its business activities as well as the challenges SC Group needs to

overcome in creating solutions. SC Group positions these material issues as an important factor in developing business strategies and in the decision-making process for individual businesses.

To enhance our sustainability management, we have identified our [“Six Key Social Issues and the Long-term Goals”](#) in 2020. The six key social issues are related to our business that we address through our business and corporate activities and consist of two themes: the sustainability of society and development and evolution of society. As one of the six key social issues, we have set "respect for human rights" and "to respect human rights through all of our businesses and supply chains" as its long-term target.

In addition to the long-term goals, we will further determine [medium-term targets and KPIs](#), which will guide us in addressing these social issues in a quantifiable way. In the interest of accountability, our progress will be monitored and disclosed to its stakeholders.

SC Group takes its commitment to tackling modern slavery and human trafficking very seriously. We set out below the steps SC Group has taken to help ensure that modern slavery and human trafficking are not taking place in SC Group’s business or supply chains:

[SC Group’s Human Rights Policy](#)

We respect [“the International Bill of Human Rights”](#) and [the International Labor Organization’s “Declaration on Fundamental Principles and Rights at Work”](#), and we operate in accordance with [“the United Nations Guiding Principles on Business and Human Rights”](#).

In line with [SC Group’s Human Rights Policy](#), i) we strive to identify and to prevent or mitigate any adverse impact on human rights through the implementation of human rights due diligence processes, ii) where we identify that our group’s practices have caused or contributed to an adverse impact on human rights, we will endeavor to take appropriate remedial measures, iii) we will seek to improve and progress human rights measures through engagement and dialogue with relevant stakeholders, and so on.

Human Rights Due Diligence

In accordance with [the SC Group Human Rights Policy](#), we began human rights due diligence in 2020 so that we can identify, prevent, mitigate and account for how we address any adverse human rights impact that SC Group business activities may cause or contribute to.

Our human rights due diligence is conducted through a process in accordance with international guidelines including [the United Nations Guiding Principles on Business and Human Rights](#), [United Nations Guiding Principles Reporting Framework](#), and [OECD Due Diligence Guidance for Responsible Business Conduct](#). As a first step in 2020, we identified eight salient human rights issues that should be addressed with priority so that we can assess impacts concerning human rights throughout SC Group,

by the desktop survey, interviews of experts on business and human rights and internal interviews.

Identified eight salient human rights issues are as follows ;

Labor conditions (wages and working hours), Freedom of association and the right to collective bargaining, Forced labor and child labor, Occupational health and safety, Health and safety of local residents, Land rights, Discrimination and harassment, and Personal information and privacy.

We believe that the human rights of workers throughout the supply chain including SC Group employees are essential as the foundations of business. In addition to the freedom of association and collective bargaining rights, forced labor and child labor, and discrimination and harassment, which are related to [the four core labor standards of the International Labour Organization \(ILO\)](#), we also take action to address labor conditions and occupational health and safety. SC Group engages in business with strong ties in local communities centered on the infrastructure business and resource development, and we have a responsibility to protect the health and safety of local residents and land rights. Moreover, since SC Group engages in wide-ranging business, we have positioned the personal information and privacy of stakeholders including customers as priority issues.

For each of these issues, we will investigate and carry out action plans to prevent and mitigate specific risks with priority on areas of high risk in SC Group's business.

[SC Group's CSR Action Guidelines for Supply Chain Management](#)

We have established [the SC Group CSR Action Guidelines for Supply Chain Management](#). Through the implementation of these guidelines, we are aiming to realize a sustainable society by working together with our suppliers, business partners and contractors, etc. to achieve responsible value chain management. As part of these guidelines, we set out its values to "Respect for human rights and not to be complicit in human rights abuses" and to "Prevent forced labor, child labor and the payment of unfairly low wages." These principles establish the overarching guidelines encompassing our commitment to combating modern slavery and human trafficking.

In the event that we find violations of these guidelines in our supply chains, we will urge the suppliers, business partners or contractors, etc. to remedy and improve the situation, while providing support to them as needed. However, if there are no improvements to the situation by them, we will consider carefully whether to continue our business with them or not.

[Enhancement of SC Group Governance](#)

In order to embody "Management base SHIFT" in [the Medium-Term Management Plan SHIFT 2023](#), we are working on "Enhancement of SC Group Governance" aiming to

improve business quality and corporate value through internal control for all consolidated subsidiaries. Specifically, we have introduced a governance framework that uses SC Group standard tool called Basic Elements to visualize the internal control status of each group company and solve issues identified through “dialogue” with the parent company.

The Basic Elements include “Respect for Human Rights”, “Labor Management, Health, Safety and the Environment”, and “Supplier Management”, and if there are issues, we formulate a response policy according to its business nature and regional conditions. Through regular monitoring, we will continue working to prevent modern slavery and human trafficking in SC Group’s business or supply chains through further enhancing governance considering its business nature and regional conditions.

Social and Environmental Risk Management in Individual Project

In order to promote social and environmental risk management for each business, taking into account the nature of the business and the characteristics of the region where it operates, we established a management system that considers social and environmental impacts when making decision on a new investment, by utilizing an assessment sheet for social and environmental risks, and by having the Corporate Sustainability Department, a specialized organization for social and environmental issues, participate in the process of deliberations.

After the implementation of each investment, we monitor the status of social and environmental risk management and if any issues arise, we will work for improvements according to the characteristics of the business.

[Active commitment to the UN Global Compact](#)

We signed [the UN Global Compact](#) and declared its support for the 10 principles in March 2009 as the parent company of SC Group. This international sustainability related initiative shares the same values as our Corporate Mission Statement. With our participation in the Global Compact, we have committed ourselves to further increasing corporate value by constantly seeking out areas of our business activities that can be improved in light of the values advocated by the 10 principles. The UN Global Compact has been referred also through the internal auditing process of SC Group.

[Training](#)

In order to raise our awareness especially about modern slavery, we have utilized an American NGO Verite's free e-Learning of Supply Chain Accountability on forced labor and human trafficking as a useful training material, which is one of the referred tools on ['Transparency in Supply Chains: A Practical guide' published by UK Home Office](#).

Since SC Group conducts a wide range of business in multiple sectors, the associated risks vary, however the eradication of any instances of modern slavery and human trafficking remains a key priority.

We will continue to undertake these efforts aimed at ensuring that no modern slavery or human trafficking of any form exists in our business and supply chains.

September xx, 2021

Hideki Yamano
Representative Director,
Senior Managing Executive Officer,
Chief Strategy Officer and Chief Information Officer
Sumitomo Corporation

This statement covers the following consolidated subsidiaries, and please refer to the appendix for each company's initiatives;

- Edgen Group Inc.
- Edgen Murray Europe Ltd.
- Eryngium Ltd.
- Fyffes Group Ltd.
- Fyffes Ltd.
- Fyffes Tropical (Ireland) Ltd.
- Howco Group Plc
- Kienle + Spiess GmbH
- Moto-Pfohe Eood
- Pacific Summit Energy LLC
- SC Foods Co., Ltd.
- Sumi Agro Europe Ltd.
- Sumi Agro Ltd.
- Sumisho Aero-Systems Corporation
- Sumisho Global Logistics Co., Ltd.
- Sumitomo Corporation Power & Mobility Co., Ltd.
- Sumitomo Corporation Asia & Oceania Pte. Ltd.
- Sumitomo Corporation Europe Ltd.
- Sumitomo Corporation Global Commodities Ltd
- Sumitomo Corporation Middle East FZE
- Sumitomo Corporation of Americas
- Sumitomo Corporation Saudi Arabia Ltd.
- Sumitomo Corporation (Shanghai) Ltd.
- Sumitomo Deutschland GmbH

- Sumitomo Shoji Chemicals Co., Ltd.
- Summit Agro International Ltd.
- Summit Exploration and Production Ltd.
- Summit Energy & Resources Pte. Ltd.
- Summit Motors Ljubljana, Export-Import-Distribucija, D.O.O.
- Summit Motors Slovakia, Spol.S.R.O.
- Summit Pharmaceuticals Europe Srl.
- Summit Pharmaceuticals International Corporation
- Tecnologia Para la Construccion Y Minería S.L.

Appendix. Initiatives of each Sumitomo Corporation Group company to eradicate modern slavery

Sumitomo Corporation	<p>In addition to the initiatives that covers Sumitomo Corporation (SC) Group described in the SC Group Statement, SC is addressing following individual initiatives:</p> <p>1) Active participation as a board member company of the Global Compact Network Japan, a local network of the United Nations Global Compact</p> <p>2) In 2020, SC conducted training for 155 new employees, 85 new managers, 59 new team leaders, and 33 new general managers on sustainability promotion, including respect for human rights. And also, we created our own e-Learning related to business and human rights, and 5,234 people including group employees mainly with SC executives and employees, completed the training. In 2020, we added the same e-Learning to the Global e-SBC training menu for overseas staffs and promoted learning. https://www.sumitomocorp.com/en/jp/sustainability/csr#03</p>
Fyffes Ltd. Fyffes Group Ltd. Fyffes Tropical (Ireland) Ltd.	<p>As a group of Fyffes Ltd., while acknowledging the SC Group's statement and complying with the California Supply Chain Transparency Act, the company's statement approved by the company's board of directors has been posted on its website (https://www.fyffes.com/modern-day-slavery/).</p> <p>1) All of Fyffes compliance team have been trained in SMETA and apply its methodology in their regular internal audits. Conducting SMETA type audits in the supply chain. The majority of its suppliers (246 sites) are SEDEX members. All of Fyffes ripening facilities were subject to unannounced SMETA audits during the year.</p> <p>2) Fyffes Group Ltd continues to audit its labour providers using a standard developed in 2016, looking at how the labour provider recruits and treats the workers.</p> <p>3) In 2020, Fyffes suspended one supplier with poor results to encourage them to improve their compliance. Once the supplier had reached a satisfactory level of compliance, we recommenced buying from this supplier.</p> <p>4) In 2019, Fyffes rolled-out `Fyffes Responsible Business Conduct Principles` (https://www.fyffes.com/our-story/our-business/#our-principles), including the requirement to be vigilant regarding coercive labour, human trafficking and child labour and to immediately report any suspicions of such activity. In 2020, Fyffes began training all employees in the Fyffes Principles and also extended the Fyffes Principles to all long-term consultants and major suppliers. In 2019 Fyffes launched a grievance mechanism made available to both internal and external stakeholders, called `the Fyffes Ethics Hotline`, an independent, confidential online and telephone hotline for reporting unethical behaviour by a Fyffes employee. (https://secure.ethicspoint.com/domain/media/en/gui/56812/index.html)</p> <p>5) Fyffes is the largest supplier of certified Fairtrade bananas in the world and has a significant number of Fairtrade melons distributed in the United States. All the pineapples sold by Fyffes are certified by Rainforest Alliance, while for bananas, in 2019 this represented approximately 25%.</p> <p>6) Rolling-out a 'Global Human Rights Policy and Statement' (https://www.fyffes.com/sustainability/policy-documents/) and bringing it to life through training and internal protocols. Fyffes has a public target to train all employees and contractors, including 100% of its supply chain in human rights by 2030.</p> <p>7) Fyffes is making progress on implementing the 11 mitigation actions to address the 13 salient risk identified in Fyffes first human rights impact assessment (https://www.fyffes.com/news/fyffes-announces-its-human-rights-mitigation-action-plan/) concluded in 2019. Fyffes has created a human rights core team to address and track progress in each area.</p> <p>8) To prevent child labour, Fyffes strict rules in place and in general do not encounter child labour on our own operations. However, to ensure smallholders do not have child labour, for example in the circumstance that a parent brings their child to work, Fyffes developed a Child Labour Remediation Protocol during 2020. Compliance personnel, auditors, human resources personnel and farm managers are trained on the Protocol so Fyffes can take swift action in the event of the discovery of a child in the workplace.</p> <p>9) In 2020, Fyffes joined the Red de Empresas Contra el Trabajo Infantil de Costa Rica (Network of Companies Against Child Labour of Costa Rica). The Network's members pledge to defend and promote the rights of the underage working population; especially, the right to education, health and development.</p>
Edgen Group Inc.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. No company website
Edgen Murray Europe Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.edgenmurray.com
Eryngium Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. No company website
Howco Group Plc	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.howcogroup.com/inside-howco/corporate-citizenship
Kienle + Spiess GmbH	Signing by three Managing Directors to the SC Group statement, and its importance and purpose were recognized by its senior management. Link to SC group statement in Downloads area on the company's website. https://www.kienle-spiess.de/kienle-spiess-home-en.html
Moto-Pfohe Eood	Signing by two Managing Directors to the SC Group statement, and its importance and purpose were recognized by its senior management. https://www.motopfohe.bg/en/about-us/our-slavery-and-human-trafficking-statement
Pacific Summit Energy LLC	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. http://pacificsummitenergy.com/
SC Foods Co., Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. <p>1) Added "Human rights, occupational safety and environmental protection" to the survey items in the "Quality Control Status Preliminary Survey Table" for inspection materials at supplier factories, etc. (ex. Confirmation of age by public documents and contents of employment contract)</p> <p>2) Applying 1) to new suppliers, and existing supplier is checked at the time of regular factory survey http://www.scfoods.co.jp/english/aboutus/outline.html</p>

Sumi Agro Europe Ltd. Sumi Agro Ltd.	While acknowledging the SC Group's statement, the company's statement approved by the company's board of directors has been posted on the company's website. 1) Adopting the SC Group CSR Action Guidelines as an official "SAE Group Rule" to reinforce the awareness to the CSR Action Guideline among the SAE Group employees and executives. 2) Requesting all suppliers to acknowledge and confirm that the products supplied to the SAE Group are produced in compliance with the CSR Action Guidelines. 3) Holding training sessions with employees regarding the principles to be followed to mitigate the risks of slavery and human trafficking in supply chains and the business. 4) Encouraging employees to identify and report potential violations of the CSR Action Guidelines and to report suspicious activities relating to slavery and human trafficking. 5) All employees and executives of SAE took the Verite's Free E-Learning courses 6) Encouraging senior managements regularly to put the priority on compliance including raising the awareness on the importance to prevent the modern slavery and human trafficking in SAE Group's business or supply chains and the necessity to compliance with the Act through monthly managements meeting which was launched in 2020. http://www.sumiagro.com/
Sumisho Aero-Systems Corporation	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.sc-aero.co.jp/company/principles.html
Sumisho Global Logistics Co., Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. http://www.sglogi.co.jp/english/about_us/index.html
Sumitomo Corporation Power & Mobility Co., Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.sc-pmco.com/en/company/csr/
Sumitomo Corporation Asia & Oceania Pte. Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.sumitomocorp.com/en/asia-oceania/sustainability/csr#03
Sumitomo Corporation Europe Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.sumitomocorp.com/en/europe/sceu/csr#02
Sumitomo Corporation Global Commodities Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. No company website
Sumitomo Corporation Middle East FZE	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.sumitomocorp.com/en/mideast/sustainability/csr#03
Sumitomo Corporation of Americas	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.sumitomocorp.com/en/us/sustainability/csr#03 SCOA's zero-tolerance policy "Human Trafficking Policy" against all forms of human trafficking and related activities.
Sumitomo Corporation Saudi Arabia Ltd.	Signing by the Managing Directors to the SC Group statement, and its importance and purpose were recognized by its senior management. https://www.sumitomocorp.com/en/mideast/sustainability/csr#03
Sumitomo Corporation (Shanghai) Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. Promoting to take SC Group's e-Learning on business and human rights (Chinese version) within SC China Group. https://www.sumitomocorp.com/en/easia/sustainability/csr#03
Sumitomo Deutschland GmbH	Signing by the Managing Directors to the SC Group statement, and its importance and purpose were recognized by its senior management. https://www.sumitomocorp.com/en/europe/sceu/csr#02
Sumitomo Shoji Chemicals Co., Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://www.sc-chem.co.jp/en/sustainability/csr/
Summit Agro International Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. http://www.summit-agro.co.jp/english/company/contribution.html
Summit Energy & Resources Pte. Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. No company website
Summit Exploration and Production Ltd.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://summiteandp.com/modern-slavery-statement/
Summit Motors Ljubljana, Export-Import-Distribucija, D.O.O.	Signing by the General Director to the SC Group statement, and its importance and purpose were recognized by its senior management. https://www.summitavto.si/en/about/social-responsibility
Summit Motors Slovakia, Spol.S.R.O.	Signing by two Managing Directors to the SC Group statement, and its importance and purpose were recognized by its senior management. https://summitmotorsba.sk/
Summit Pharmaceuticals Europe Srl.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. https://summitpharmaeurope.com/about-us/our-responsibility/
Summit Pharmaceuticals International Corporation	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. (Among the directors, executive officers and general managers, understanding the background and objective of the Modern Slavery Act, and noticing it and confirming in compliance with the SC Group CSR Action Guidelines through reporting lines.) https://www.summitpharma.co.jp/english/index.html
Tecnologia Para la Construccion Y Minería S.L.	The SC Group's statement was endorsed by the company's board of directors, and its importance and purpose were recognized by its senior management. No company website

住友商事グループ

2020 年度 現代奴隷法に係る声明(仮訳)

住友商事グループは、取引先やビジネスパートナーとともに、世界における奴隷労働や人身売買等の撲滅に努めています。

本声明は、[英国現代奴隷法](#)に従い、住友商事グループの2020年度の取り組みを公表するものです。住友商事はグループの親会社として毎年、本件声明を取締役会で決議しており、この声明は2021年8月30日開催の取締役会にて承認しております。

組織について

当社グループは、国内及び海外の60カ国以上に130超の拠点をもち、900社を超える事業会社を通じて、さまざまな産業分野で多くの取引先や消費者との信頼関係をベースに、多様な商品・サービスの国内販売、輸出入および三国間取引、さらには国内外における事業投資など、総合力を生かした多角的な事業活動を展開しており、70,000人以上が就業しています。

当社グループの事業詳細につきましては、以下のウェブサイトをご覧ください。

<https://www.sumitomocorp.com/ja/jp/about>

住友商事グループの事業およびサプライチェーンにおける現代奴隷防止に関する取り組み

当社グループの根幹には、住友政友(1585-1652)による創業以来、400年にわたって脈々と受け継がれてきた「[住友の事業精神](#)」があります。これを礎に「[住友商事グループの経営理念・行動指針](#)」を策定し、価値判断のよりどころとして確立させており、その中で「人間尊重を基本とし、信用を重んじ確実を旨とする」と明確にうたっています。

また、2017年には、事業活動を行うにあたり、特に重要と捉え、解決に向けて優先的に取り組む社会課題と、解決に取り組む上での当社グループ自身の課題を「[社会とともに持続的に成長するための6つのマテリアリティ\(重要課題\)](#)」として特定しており、事業戦略の策定や個々のビジネスの意思決定プロセスにおける重要な要素と位置づけています。

2020年には、サステナビリティ経営の高度化の一環として、「社会の持続可能性」と「社会の発展と進化」の2つのテーマを柱に[6つの重要社会課題と長期目標](#)を定め、重要社会課題の一つに「人権尊重」を掲げ、長期目標として「全事業・サプライチェーンにおける人

権の尊重」を設定しました。今後、具体的なアクションプランを含む[中期目標並びに KPI](#) (重要な評価指標)を設定し、モニタリングを実施、取組みを推進するとともに、その進捗を開示していきます。

当社グループは、現代奴隷に関する問題を真摯にとらえ、その事業およびサプライチェーンにおける現代奴隷の防止に向けて、以下のような取組みを行っています。

[住友商事グループ人権方針](#)

当社は、「[国際人権章典](#)」および[国際労働機関\(ILO\)の「労働における基本的原則及び権利に関する宣言」](#)が定める人権を尊重し、国連「ビジネスと人権に関する指導原則」に則って活動すべく、「[住友商事グループ人権方針](#)」において、i)人権デューデリジェンスの取組みを通じ、人権への負の影響の特定・防止・軽減に努めること、ii)当社グループの活動が人権に負の影響を与えていること、または助長したことが明らかとなった場合には、適切な措置を講じることでその救済に努めること、iii)ステークホルダーとの対話・協議により人権尊重の取組みの向上と改善に努めること、等を定めています。

人権デューデリジェンス

当社は、[人権方針](#)に基づき、当社グループの事業活動に与える人権へのリスクを特定・防止・是正するために、2020年より人権デューデリジェンスを開始しました。当社の人権デュー・デリジェンスは、[国連「ビジネスと人権に関する指導原則」](#)、「[国連指導原則報告フレームワーク](#)」、「[OECD 責任ある企業行動のためのデュー・デリジェンスガイド](#)」など、国際的なガイドラインに沿ったプロセスで実施しています。

最初のステップとして、グループ全体の人権への影響・リスクを評価すべく、デスクトップ調査・専門家へのヒアリング・社内インタビューを行い、当社グループが優先的に対応すべき、8つの顕著な人権課題を特定しました。

特定した8つの顕著な人権問題は、次のとおりです。

「労働条件(賃金・労働時間)」「結社の自由と団体交渉権」「強制労働・児童労働」「労働安全衛生」「地域住民の健康安全」「土地の権利」「差別・ハラスメント」「個人情報・プライバシー」

当社グループの従業員を含むサプライチェーン全体の労働者の人権はビジネスの基盤にかかわる重要な課題であり、[国際労働機関\(ILO\)の4つの中核的労働基準](#)にも関連する「結社の自由と団体交渉権」、「強制労働・児童労働」、「差別・ハラスメント」に加え、「労働条件」「労働安全衛生」に取り組んでいきます。当社グループでは、インフラ事業や資源開発を含め地域社会に深く根差した事業を行っており、「地域住民の健康安全」や「土地の権利」を尊重する責任があります。また、幅広い事業を行っていく上で、顧客や消費者の「個人情報・プライバシー」についても重要な課題の一つと位置付けています。

今後、これらの課題毎に、当社グループの事業でリスクの高い分野から優先的に、具体的なリスク防止・軽減のための行動計画を検討・実行していきます。

住友商事グループのサプライチェーン CSR 行動指針

当社は、持続可能な社会の実現に向けて、取引先や事業パートナーとともに社会的責任を果たすべく、「住友商事グループのサプライチェーン CSR 行動指針」を制定しています。その中で「人権を尊重し、人権侵害に加担しない」、「強制労働・児童労働・不当な低賃金労働を防止する」とうたっており、現代奴隷の防止に関する指針としています。

万が一、本行動指針に抵触する事態が判明した場合には、まず当該取引先や事業パートナーに対し改善を促すとともに、必要に応じて指導・支援を行い、事態の改善を求めています。継続的な指導・支援を実施したにもかかわらず、是正が困難と判断された場合には、当該取引先や事業パートナーとの取引を見直していきます。

グループガバナンスの高度化

当社は、中期経営計画 SHIFT2023における「経営基盤のシフト」を具現化するため、全ての連結子会社を対象に、内部統制を通じた業務品質および企業価値向上を目指す「グループガバナンスの高度化」に取り組んでいます。具体的には、Basic Elements というグループ標準ツールを活用し、グループ各社の内部統制状況を可視化し、親会社との「対話」を通じて認識された課題を解決していくガバナンスのフレームワークを導入しています。

この Basic Elements には「人権の尊重」、「労務管理、安全衛生管理」及び「サプライヤー管理」の各項目が含まれており、それらの状況を定期的にモニタリングし、課題がある場合、各事業の特性に応じた対応方針を策定することにより、当社グループは引き続き、自らの事業およびサプライチェーンにおける現代奴隷の防止に向けて取り組んでいきます。

社会・環境関連リスク管理

当社は、当社グループの各事業について、事業内容や地域の特性に応じたリスク管理を推進すべく、新規投資の申請時に、所定の評価シートを活用して、各事業の内容・地域特性等から想定される機会・リスクを洗い出すとともに、そのリスクに応じて、社会課題への対応に関する専門組織であるサステナビリティ推進部が審議過程に参加するなど、リスク状況に応じた意思決定を行う体制を整えています。

投資実施後も各事業会社の社会・環境リスク管理状況のモニタリングを行い、課題がある場合には改善に取り組みます。

国連グローバル・コンパクトへの積極的な参画

当社は2009年3月、当社グループの経営理念と共通の価値観を提唱する[国連グローバル・コンパクト10原則](#)に署名し、常に同10原則の価値観を企業活動に照らして改善点を見極め、より一層の企業価値向上に取り組んでいます。内部監査においても同10原則を参照しています。

研修

当社は、現代奴隷に関する当社グループ内の理解を深め、意識を高める為、[英国内務省が発行する英国現代奴隷法への対応ガイダンス](#)上で研修ツールの一つとして推奨されている米国 NGO (Verite) による強制労働と人身売買に関する英語版無料 e-Learning の受講を当社グループ内で推進しています。

当社グループはさまざまな分野の事業に従事し、関連するリスクも多岐にわたりますが、現代奴隷の撲滅はどの分野においても重要だと考えており、引き続き、現代奴隷の防止に関する取り組みを継続していきます。

2021年9月xx日

山埜 英樹

住友商事株式会社

代表取締役 専務執行役員

コーポレート部門 企画担当役員 CSO・CIO

なお、この声明は、以下の連結子会社を対象に含んでおり、各社の取組みは付属書をご参照下さい。

- Edgen Group Inc.
- Edgen Murray Europe Ltd.
- Eryngium Ltd.
- Fyffes Group Ltd.
- Fyffes Ltd.
- Fyffes Tropical (Ireland) Ltd.
- Howco Group Plc
- Kienle + Spiess GmbH
- Moto-Pfohe Eood

- Pacific Summit Energy LLC
- 住商フーズ株式会社
- Sumi Agro Europe Ltd.
- Sumi Agro Ltd.
- 住商エアロシステム株式会社
- 住商グローバル・ロジスティクス株式会社
- 住友商事パワー&モビリティ株式会社
- Sumitomo Corporation Asia & Oceania Pte. Ltd.
- Sumitomo Corporation Europe Ltd.
- Sumitomo Corporation Global Commodities Ltd.
- Sumitomo Corporation Middle East FZE
- Sumitomo Corporation of Americas
- Sumitomo Corporation Saudi Arabia Ltd.
- Sumitomo Corporation (Shanghai) Ltd.
- Sumitomo Deutschland GmbH
- 住友商事ケミカル株式会社
- 住商アグロインターナショナル株式会社
- Summit Exploration and Production Ltd.
- Summit Energy & Resources Pte. Ltd.
- Summit Motors Ljubljana, Export-Import-Distribucija, D.O.O.
- Summit Motors Slovakia, Spol.S.R.O.
- Summit Pharmaceuticals Europe Srl.
- 住商ファーマインターナショナル株式会社
- Tecnologia Para la Construccion Y Minería S.L.

付属書：現代奴隷撲滅に向けた住友商事グループ各社の取組み

住友商事株式会社	<p>SCグループ声明に記載しているグループ全体の取組み以外に、単体での取組みとして、</p> <p>①国連グローバルコンパクトの日本国内ネットワークであるグローバル・コンパクト・ネットワーク・ジャパンの理事会員企業として積極的に活動</p> <p>②2020年度に実施した研修として、新入社員155名・新任管理職85名・新任チームリーダー59名・新任部長33名に対し、人権尊重を含むサステナビリティ推進に関する研修を実施。また、「ビジネスと人権」に関するe-Learningを独自に作成し、当社役職員を中心にグループ社員を含め計5,234人が受講修了。2020年度には、海外スタッフ向けの研修メニューGlobal e-SBCに同e-Learningを追加し、受講を推進。</p> <p>https://www.sumitomocorp.com/en/jp/sustainability/csr#03</p>
Fyffes Ltd. Fyffes Group Ltd. Fyffes Tropical (Ireland) Ltd.	<p>Fyffesグループとして、SCグループ声明を支持し、The California Transparency in Supply Chains Actに対応すると同時に、同社取締役会で決議された独自声明を同社HP上で公開している。 (https://www.fyffes.com/modern-day-slavery/)</p> <p>①Fyffesのコンプライアンス担当チームは全員SMETAに関して教育を受けており、通常の監査においてその手法を適用している。SMETAタイプの監査はサプライチェーン上で実施され、仕入先（246拠点）の過半がSEDEX会員。全ての熟成施設が事前通告なしのSMETA監査の対象となっている。</p> <p>②Fyffes Group Ltd.では2016年作成の基準に従い、人材派遣業者の採用・処遇状況に対する監査を継続実施。</p> <p>③2020年、コンプライアンス対応の改善を促すために仕入先1社との取引を一時停止したが、適切な改善が行われたことを確認のうえ取引を再開した。</p> <p>④2019年、強制労働や人身売買、児童労働に関する意識向上と、疑義があった際の速やかな報告を求める内容を含む、Fyffes Responsible Business Conduct Principlesを制定 (https://www.fyffes.com/our-story/our-business/#our-principles)。2020年には、全従業員と長期で取引のあるコンサルタント、主な仕入先向けにFyffes Principlesに対して研修を開始。また2019年、従業員に不適切な行いがあった場合の報告先として、第3社が運営し、社内外の関係者が匿名で利用可能な“Fyffes Ethics Hotline”を開設 (https://secure.ethicspoint.com/domain/media/en/gui/56812/index.html)。</p> <p>⑤Fyffesは欧州最大のFairtrade認証バナナ取扱業者であり、米国向けにも同認証メロンを大規模に輸出している。また、2019年に取り扱ったパイナップルの全数量とバナナの約25%の数量がRainforest Alliance認証を受けている。</p> <p>⑥Global Human Rights Policy and Statement (https://www.fyffes.com/sustainability/policy-documents/) を制定し、社内の研修やプロトコルを通じて実行に移している。Fyffesは、2030年までにサプライチェーンにおける全ての従業員、契約先に対して人権に関する研修を実施する目標を公表済み。</p> <p>⑦Fyffesは、2019年に実施したHuman Rights Impact Assessmentにおいて判明した13のリスクについて、11の改善策を実行に移している。Human Rights Core Teamを組成し、各地域での取り組み推進と状況確認を行っている。(https://www.fyffes.com/news/fyffes-announces-its-human-rights-mitigation-action-plan/)</p> <p>⑧児童労働防止のため、Fyffesは厳格な規則を設定しており、Fyffes自身のオペレーションの中で児童労働を見かけることは通常無い。しかしながら、小規模農家等で児童労働が行われることの無いよう、2020年にChild Labour Remediation Protocolを作成し、職場で児童が発見された場合に迅速な対応を取ることが出来るように、コンプライアンス担当者や監査担当者、人事担当者や農園マネージャーに対して研修を実施している。</p> <p>⑨2020年、Fyffesはthe Red de Empresas Contra el Trabajo Infantil de Costa Rica（コスタリカの児童労働に反対する企業のネットワーク）に加入。同ネットワーク加入企業は、若年労働人口の権利（特に教育、健康、成長に関して）への取り組みと保護を約束している。</p>
Edgen Group Inc.	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HPなし
Edgen Murray Europe Ltd.	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知 https://www.edgenmurray.com
Eryngium Ltd.	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HPなし
Howco Group Plc	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知 https://www.howcogroup.com/inside-howco/corporate-citizenship
Kienle + Spiess GmbH	Managing Director3名によるSCグループ声明への署名、本意義・目的を経営層で認識。同社HP上のDownloads欄にSCグループ声明へのリンクを設定 https://www.kienle-spiess.de/kienle-spiess-home-en.html
Moto-Pfohe Eood	Managing Director2名によるSCグループ声明への署名、本意義・目的を経営層で認識。同社HP上で同方針を周知 https://www.motopfohe.bg/en/about-us/our-slavery-and-human-trafficking-statement
Pacific Summit Energy LLC	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知 http://pacificsummitenergy.com/
住商フーズ株式会社	<p>SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知</p> <p>①仕入先工場等の点検資料「品質管理状況事前調査表」の調査項目に「人権・労働安全・環境保全」を追記（ex.公的書類による年齢確認や雇用契約等の確認）</p> <p>②新規サプライヤーから①を運用、既存サプライヤーは定期工場調査の際に調査</p> <p>http://www.scfoods.co.jp/aboutus/outline.html</p>

Sumi Agro Europe Ltd. Sumi Agro Ltd.	SCグループ声明を支持すると共に、以下内容を含むSAEグループ声明を取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知 ①新グループ規程として「CSR行動指針（CSR Action Guideline for Supply Chain Management）」を制定（2016年） ②SAE社長署名入り方針レターを全仕入先に出状（2016年） ③SAEグループトップ会議や階層別リスクマネジメントセミナーを実施 ④CSR行動指針違反の可能性や強制労働・人身売買に関連する疑わしい行動があれば報告するよう従業員に周知徹底 ⑤SAE全役員並びにSALにおいて、強制労働や人身売買に関するVerite Free e-Learningを受講 ⑥2020年設置の月次経営会議を通じてコンプライアンス優先を徹底、強制労働や人身売買の防止の重要性等について定期的に経営層で認識徹底 http://www.sumiagro.com/
住商エアロシステム株式会社	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知 https://www.sc-aero.co.jp/company/principles.html
住商グローバルロジスティクス株式会社	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知 http://www.sglogi.co.jp/about_us/index.html
住友商事パワー＆モビリティ株式会社	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知 https://www.sc-pmco.com/company/csr/
Sumitomo Corporation Asia & Oceania Pte. Ltd.	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知 https://www.sumitomocorp.com/en/asia-oceania/sustainability/csr#03
Sumitomo Corporation Europe Ltd.	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知 https://www.sumitomocorp.com/en/europe/sceu/csr#02
Sumitomo Corporation Global Commodities Ltd.	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HPなし
Sumitomo Corporation Middle East FZE	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知 https://www.sumitomocorp.com/en/mideast/sustainability/csr#03
Sumitomo Corporation of Americas	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知 社内規程として“Human Trafficking Policy”あり、人身売買に対する姿勢を明示 https://www.sumitomocorp.com/en/us/sustainability/csr#03
Sumitomo Corporation Saudi Arabia Ltd.	Managing DirectorによるSCグループ声明への署名、本意義・目的を経営層で認識 https://www.sumitomocorp.com/en/mideast/sustainability/csr#03
Sumitomo Corporation (Shanghai) Ltd.	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知 中国住商グループ内にて、ビジネスと人権に関するe-Learning（中国語版）受講を推進 https://www.sumitomocorp.com/en/easia/sustainability/csr#03
Sumitomo Deutschland GmbH	Managing DirectorによるSCグループ声明への署名、本意義・目的を経営層で認識。 https://www.sumitomocorp.com/en/europe/sceu/csr#02
住友商事ケミカル株式会社	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知 https://www.sc-chem.co.jp/sustainability/csr/
住商アグロインターナショナル株式会社	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知 （具体的には、日々の営業活動における遵守、取引先の遵守状況の注視、信用調査におけるチェックなど） http://www.summit-agro.co.jp/company/contribution.html
Summit Energy & Resources Pte. Ltd.	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HPなし
Summit Exploration and Production Ltd.	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知 https://summiteandp.com/modern-slavery-statement/
Summit Motors Ljubljana, Export-Import-Distribucija, D.O.O.	General DirectorによるSCグループ声明への署名、本意義・目的を経営層で認識。子会社ディーラーのHP上で同声明をスロベニア語で掲載 https://www.summitavto.si/en/about/social-responsibility
Summit Motors Slovakia, Spol.S.R.O.	Managing Director2名によるSCグループ声明への署名、本意義・目的を経営層で認識。子会社ディーラーのHP上で同声明をスロバキア語と英語で掲載 https://summitmotorsba.sk/
Summit Pharmaceuticals Europe Srl.	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HP上で同方針を周知 https://summitpharmaeurope.com/about-us/our-responsibility/
住商ファーマインターナショナル株式会社	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識し、職制を通じて社内浸透。同社HP上で同方針を周知 https://www.summitpharma.co.jp/japanese/
Tecnologia Para la Construcción Y Minería S.L.	SCグループ声明を同社取締役会で決議し、本意義・目的を経営層で認識。同社HPなし