

Rules and Regulations	Human Rights Policy for Group of Sumitomo Bakelite Co., Ltd.	Basic
Group		0005-4

1. Purpose

Sumitomo Bakelite Co., Ltd. has established this “Human Rights Policy for Group of Sumitomo Bakelite Co., Ltd.” (hereinafter "Policy"), to guide Sumitomo Bakelite Co., Ltd. and its subsidiaries (hereinafter "Our Group") efforts to respect human rights in Our Group’s business activities, together with the "Business Philosophy", "Our Code of Conduct", "Code of Ethics for Group of Sumitomo Bakelite Co., Ltd." , etc.

2. Basic Principles on Human Rights/Supporting and Respecting International Standards on Human Rights

Our Group will support and respect the internationally recognized human rights which are defined in the “International Bill of Human Rights (“Universal Declaration of Human Rights”, “International Covenant on Civil and Political Rights”, and “International Covenant on Economic, Social and Cultural Rights”)” , ILO’s “Declaration on Fundamental Principles and Rights at Work”, etc. Our Group will support and respect the UN “Guiding Principles on Business and Human Rights”, the “OECD “Guidelines for Multinational Enterprises” and other international standards on human rights, and will conduct our Group’s business activities in accordance with these international standards on human rights.

Our Group will comply with the laws and regulations of each country/region where Our Group conducts its business activities. If there are any conflicts between the laws and regulations of each country/region and these international standards on human rights, we will seek ways to respect these international standards on human rights as much as possible.

3. Basic Principles on Human Rights / Respect for Human Rights through Business Activities

Our Group will fulfill its responsibility to respect human rights, by not violating the human rights of those who are affected by Our Group's business activities, and by taking appropriate measures for corrective action if it becomes clear that Our Group's business activities have caused or contributed to adverse impacts on the human rights.

Our group recognizes that Our Group’s commitment to human rights issues related to its business activities, including the following, is an important element in fulfilling its responsibility to respect human rights.

(1) Prohibition of child labor

Our Group will not tolerate any child labor (especially “the worst forms of child labor”, such as forced or compulsory recruitment into armed conflict and work by its nature that is likely to harm the health, safety or morals of children).

(2) Prohibition of forced labor

Our Group will not tolerate modern slavery in the forms of forced labor, debt bondage (work in situations where a person is forced to work for an employer to repay a debt) and human trafficking.

(3) Prohibition of discrimination

Our Group will not tolerate discrimination in any way based on sex, age, nationality, ethnicity, race, religion, ideology or creed, sexual orientation or gender identity, or disability, etc. in employment and work situations.

(4) Prohibition of harassment and violence

Our Group will not tolerate harassment or behavior that hurts others, whether mentally or physically.

(5) Respect for fundamental labor rights

In addition to complying with laws and regulations related to fundamental labor rights (freedom of association, workers' right to collective bargaining, etc.), Our Group will support and respect these rights.

(6) Reduction of excessive working hours

In addition to complying with laws and regulations and managing working hours, overtime, holidays, and vacations appropriately, Our Group will endeavor to reduce excessive working hours.

(7) Payment of appropriate wages and allowances

Our Group will pay wages and appropriate allowances that exceed the legally mandated minimum wage and meet the living wage (the wage necessary for basic, but decent life style).

0005-4	Human Rights Policy for Group of Sumitomo Bakelite Co., Ltd.	2
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(8)Ensuring a safe and healthy working environment

Our Group will actively endeavor to ensure a safe and healthy working environment based on Our Group's Safety Philosophy,"Safety is the first priority of all."

4. Scope of Application

This Policy applies to all directors, officers and employees of Our Group. In addition, Our Group expects all business partners who are involved in Our Group's business activities, products, and services, to understand and support this Policy.

5. Human Rights Due Diligence

Our Group will establish appropriate human rights due diligence system and mechanism in accordance with the United Nations "Guiding Principles on Business and Human Rights", and Our Group will identify the adverse impacts on human rights of those who are affected by Our Group's business activities and will endeavor to prevent and reduce such adverse impacts.

6. Training

In order to ensure that this Policy is incorporated into all Our Group's business activities and implemented effectively, Our Group will provide appropriate training to our directors, officers, and employees, and will endeavor to ensure that all business partners and other persons who are affected by Our Group's business activities understand this Policy.

7. Dialogue and Consultation with Stakeholders

In Our Group's efforts to respect human rights, Our Group will engage in dialogue and consultation with stakeholders, including human rights experts, labor unions, and business partners etc., and will promote comprehensive measures based on specialized knowledge and a wide range of ideas.

8. Grievance Mechanism

Our Group will maintain the existing whistleblowing and consultation contacts to ensure access to remedies from within and outside Our Group, and will work to develop and operate a more effective grievance mechanism.

9. Information Disclosure

Our Group will regularly disclose information on the progress and results of our efforts to respect human rights based on this Policy through Our Group's website and other means.

This Policy was resolved by the board of directors meeting of Sumitomo Bakelite Co., Ltd. held on January 31, 2024.