

The Group's Compliance Reporting System

Compliance Reporting System of Group of Sumitomo Bakelite Co., Ltd.

Introduction

To detect and prevent non-compliance at an early stage, the Group of Sumitomo Bakelite Co., Ltd. (Our Group) has introduced a whistleblowing system (known as the Compliance Reporting System in our Group) that allows you to report non-compliance or the threat of non-compliance to an internal whistleblower contact or external whistleblower contact.

Summary of Compliance Reporting System

What can be reported to this "Compliance Reporting System"?

Act or omission that violates compliance (laws, company rules, or "Code of Ethics for the Group of Sumitomo Bakelite Co., Ltd.") or act or omission that may lead to such violation

Who can use this "Compliance Reporting System"?

- All Directors, Officers, employees (including contract, temporary, commissioned, dispatched, seconded, part-time, and short-term employees) in Group companies of Sumitomo Bakelite Co., Ltd.
- Stakeholders of group companies of Sumitomo Bakelite Co., Ltd. (including retired employee, applicants for employment, and business partners)

Who are the "Reporting Contacts"?

You can choose to report to either of the following Reporting Contacts.

• Internal Reporting Contact

General Manager, Internal Audit Dept. of Sumitomo Bakelite Co., Ltd.

E-mail : compliance@ml.sumibe.co.jp

(This E-mail will be automatically forwarded only to General Manager, Internal Audit Dept.)

Address : 5-8, Higashi-Shinagawa 2-chome, Shinagawa-ku, Tokyo 140-0002, Japan

• External Reporting Contact

Nakajima Transactional Law Office

Attn: Attorney-at-law in charge of "Compliance Reporting System" of Sumitomo Bakelite Co., Ltd.

E-mail : sumibe-compliance@galaxy.ocn.ne.jp

Address : Kasumigaseki Building 24F 2-5, Kasumigaseki 3-chome Chiyoda-ku, Tokyo, 100-6024, Japan

How can you contact Reporting Contact for "Compliance Reporting System"?

- If you need to make a Whistleblowing report, you can fill out "Compliance Reporting Form" (please download from the following link) and send it to Reporting Contact by e-mail or mail.
- You can also make a Whistleblowing report anonymously.
- However, we recommend that you make a report under your own name. This is because anonymity limits the ability to investigate and take corrective action.

📄 [Compliance Reporting Form](#)

Receipt, reporting, investigation, etc.

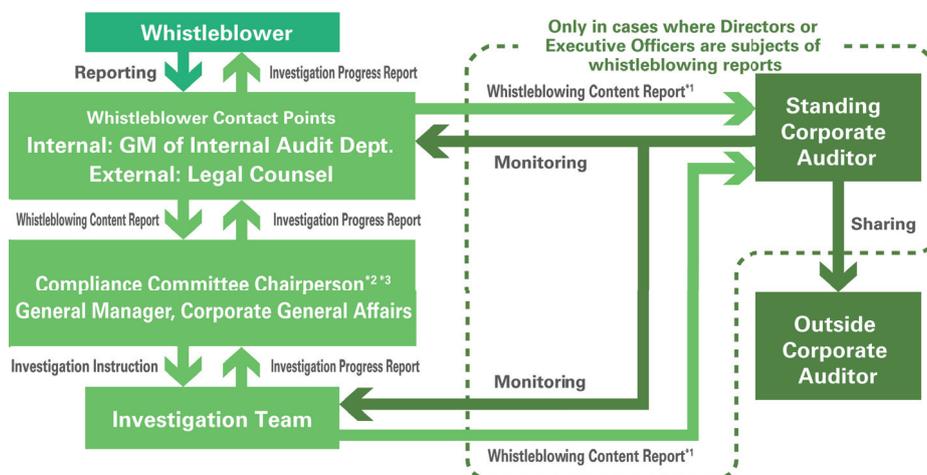
- Upon receiving a whistleblower's report, the Reporting Contact will report it to the Chairperson of Compliance Committee* and the General Manager of Corporate General Affairs of Sumitomo Bakelite Co., Ltd. Following this, the Chairperson of Compliance Committee* directs an Investigation Team consisting of members of the relevant departments to investigate the incident and consider countermeasures.
- If any of the Reporting Contact, Chairperson of Compliance Committee*, General Manager of the Corporate General Affairs Division, or member(s) of the Investigation Team has an interest in the incident that is the subject of the above investigation, he/she will be excluded from the above reporting or investigation.
- If and to the extent that Director(s) or Executive Officer(s) of Sumitomo Bakelite Co., Ltd. has an interest in the facts that are the subject of an investigation, in order to ensure independence from Director(s) or Executive Officer(s), the contents of Whistleblowing reports, investigations, etc. will be monitored by the Standing Corporate Auditors of Sumitomo Bakelite Co., Ltd. At that time, information that

could lead to the identification of the whistleblower will be removed by means of anonymization, etc., and then the contents of the Whistleblowing report and the contents of the investigation will be shared with the Standing Corporate Auditors.

- Except in cases where whistleblower cannot be contacted due to anonymous reporting or other due reasons, whistleblower will be informed of the receipt of reporting, the results of the investigation and the measures to be taken.

* If the Chairperson (President) is the subject of the report, the Vice Chairperson will act for the Chairperson.

Compliance Reporting System Response Flow



*1 Information that can identify the whistleblower is removed from the report.

*2 President

*3 If the chairperson is the subject of the report, the vice chairperson will act for the chairperson.

* If any member of the reporting contact point, Compliance Committee Chairperson, General Manager of Corporate General Affairs, or a member of the investigation team has an interest in the facts under investigation, they are excluded from the reporting and information sharing.

* The Investigation Team may report the progress of the investigation directly to the whistleblower after obtaining the approval of the whistleblower.

Confidentiality

- Reporting Contact, Chairperson of Compliance Committee, General Manager of the Corporate General Affairs Division, or member(s) of the Investigation Team will not share or disclose any information that may lead to the identification of whistleblower(s), except for the minimum number of people deemed necessary for the investigation and taking corrective measures. In addition, they will not use such information for any purpose other than that necessary for the investigation and taking corrective measures.

Prohibition of searching and detrimental treatment

- Searching for the identity of the whistleblower is strictly prohibited.
- Detrimental treatment (for example, dismissal, disciplinary action, demotion, pay reduction, detrimental reassignment/secondment/transfer, recommendation to resign, refusal to renew a labor contract, and de facto harassment) of the whistleblower and/or anyone who cooperates with the investigation is strictly prohibited for they making a report or cooperating with an investigation.
- Any Officer or employee of our Group who violates the above prohibition matters will be disciplined in accordance with each company's labor regulations and/or other internal rules governing disciplinary action.

Prohibition of reporting for fraudulent purposes

- Reporting for the purpose of fraud (e.g., false reporting or reporting for the purpose of defaming others) is strictly prohibited. On the other hand, our Group will not take advantage of the above to prevent reporting for non-fraudulent purposes.
- Any Officer or employee of our Group who violates the above prohibition matters will be disciplined in accordance with each company's labor regulations and/or other internal rules governing disciplinary action.

“Consultation” with the Reporting Contact

- You can make “consultation” with the Reporting Contact to receive necessary advice prior to or in connection with the whistleblowing report. When you want to make “consultation,” please clarify that it is a “consultation” and not a “whistleblowing report.”
- Please note that any action, including investigation and corrective action, will NOT be taken in the case of a “consultation.”
- In the case of a “consultation,” any information that could lead to the identification of the person consulting is protected, and any detrimental treatment due to “consultation” is strictly prohibited.

Number of Reports, etc.

For the number of reports, etc. to the Group-wide Compliance Reporting System and internal reporting systems of our subsidiaries, see the following link.

[Data > Detailed Data Related to Sustainability \(Governance\)](#)