

Sumi Agro Europe Limited

Slavery and Human Trafficking Statement for the Financial Year 2024

1. Overview

This statement is made pursuant to Part 6, section 54 of the Modern Slavery Act 2015 (the “**Act**”) and constitutes the slavery and human trafficking statement for the financial year 2024 for Sumi Agro Europe Limited (“**SAE**”) and its subsidiaries (collectively the “**SAE Group**”), a member of the Sumitomo Corporation Group (the “**Group**”), with its headquarters in Tokyo, Japan. The statement is approved by the board of directors of SAE.

The SAE Group is in the business of the marketing and distribution of plant protection products, including agro chemicals, fertilizers, and seeds. The SAE Group is able to provide a powerful platform in the agriculture sector for new product developments, product registration, strong marketing and reliable logistics. The SAE Group has around 350 employees (on a consolidated basis) with a core operation run through subsidiaries and branch offices in Poland, Hungary, Romania, Czech Republic, Slovakia, Bulgaria, Germany, France, Ukraine and Russia. Suppliers to the SAE Group include various producers mainly from Japan and the European Union.

The Corporate Mission Statement of the Group comprises the “*Management Principles and Activity Guidelines*”, a fundamental and long-standing value paradigm of the Group, derived from over 400 years of history. As expressly declared in the Guidelines, the Group aims to respect the personality of each individual and places prime importance on integrity and sound management.

2. Implementation Steps

Set out below are the measures the SAE Group has implemented to ensure slavery and human trafficking do not take place in the SAE Group’s supply chains or business:

Action Guidelines for Supply Chain Management

In November 2009, in order to promote sustainability and social wellbeing in accordance with the Group’s values, the Group established the “*CSR Action Guidelines for Supply Chain Management*” (the “**CSR Action Guidelines**”). SAE Group, as a member of the Group, upholds the CSR Action Guidelines by incorporating it into its company rules (see Exhibit), and by working together with suppliers and business partners to achieve responsible value chain management. Our suppliers and business partners are expected to, amongst other declared principles, “respect human rights and not to be complicit in human rights abuses”, “prevent forced labour, child labour and the payment of unfairly low wages” and “provide employees with safe and healthy work environments.” The CSR Action Guidelines establish overarching principles encompassing our robust commitment to combat slavery and human trafficking in our supply chains. The CSR Action Guidelines are published and accessible on the Group’s website.

Identification of the Group’s Material Issues

SAE Group’s ultimate parent company, Sumitomo Corporation announced the identification of its “Six Material Issues to Achieve Sustainable Growth with Society” in April 2017, a set of social issues that the Group regards as important and should prioritize addressing through its business activities, as well as the challenges the Group needs to overcome in creating solutions.

These material issues were defined based on Sumitomo's Business Philosophy and the Group's Corporate Mission Statement. Going forward, the Group will position these material issues as an important factor in developing business strategies and in the decision-making process for individual businesses.

Issues that the Group should prioritize addressing through its business activities:

- Achieving harmony with the global environment
- Contributing to the development of local communities and industries
- Establishing a foundation for comfortable and enriching lifestyles
- Providing diverse "Accessibility"

The challenges the Group needs to overcome in creating solutions:

- Developing human resources and promoting diversity
- Enhancing governance

The SAE Group will continue to help ensure that modern slavery and human trafficking are not taking place in the SAE Group's business or supply chains through enhancing governance.

Active commitment to the UN Global Compact

In March 2009, the Group declared its support for the 10 principles of the UN Global Compact, an international CSR-related initiative sharing similar values to the Group's Corporate Mission Statement. With our participation in the Global Compact, SAE Group, as a member of the Group, has committed itself to seeking out areas of its business activities that can be improved in light of the values advocated by the 10 principles. In addition, SAE Group's ultimate parent company, Sumitomo Corporation, actively participates as a Member of the Global Compact Network Japan, a local Global Compact network. Through this involvement, Sumitomo Corporation has been provided with insight from specialists on recent global trends and the latest thinking on diverse topics including human rights due diligence. As a result of attending Global Network Japan study groups focused on these themes, Sumitomo Corporation has utilised the knowledge it has gained to further strengthen its own CSR programmes.

SAE Group's Initiatives for 2024

In addition to the general policy outlined above, the SAE Group has taken the following initiatives in 2024:

1. To raise our awareness especially about modern slavery, SAE Group utilises an American NGO Verite's free e-Learning of Supply Chain Accountability on forced labour 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.](#)
2. Encouraging employees to identify and report potential violations of the CSR Action Guidelines and to report suspicious activities relating to slavery and human trafficking.
3. In order to embody "Reinforcement of Management Bases" in [the Medium-Term Management Plan "Shift 2023" of Sumitomo Corporation.](#) as a member of Sumitomo Corporation Group, SAE Group is working on annual review and enhancement of its group governance aiming to improve business quality and corporate value through internal control. Specifically, we have introduced a governance framework that uses a standard tool called Basic Elements to visualise the internal control status and solve issues identified through dialogue with the parent company.

The Basic Elements include “Respect for Human Rights”, “Labour 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, SAE Group will continue working to prevent modern slavery and human trafficking in SAE Group’s business or supply chains through further enhancing governance considering its business nature and regional conditions.

4. Encouraging senior management to prioritise compliance including raising awareness on the importance of preventing modern slavery and human trafficking in SAE Group’s business or supply chains and the necessity to comply with the Act through monthly management meetings launched in 2020.
5. Holding monthly functional meetings among the SAE Group by department for further enhancement of SAE Group’s governance, supply chains and compliance with regulations and laws.

3. Continued Commitment

The SAE Group, as a member of Sumitomo Corporation Group, acknowledges the seriousness of identifying and immediately addressing any incidences of slavery and human trafficking in its supply chains and businesses worldwide, and shows commitment to respect of human rights by operating our businesses in accordance with SC Group’s Human Rights Policy, as well as the UN Guiding Principles on Business and Human Rights.

Sumi Agro Europe Limited
CEO


Tomoaki Tetsu (Jun 24, 2025 17:08 GMT+1)

Tomoaki Tetsu

June 30, 2025

Exhibit

Sumi Agro Europe Group CSR Action Guidelines for Supply Chain Management

The Sumi Agro Europe Group aims to be a global organization that constantly stays a step ahead in dealing with change, creates new value and contributes broadly to society.

With the integrated corporate strength of Sumi Agro Europe and its local sales and marketing organizations together with Sumitomo Corporation, we are able to provide a powerful platform in the agriculture sector for new product developments, product registration, strong marketing and reliable logistics. This excellent knowledge and experience is combined with long-term relationships with our loyal partners in agriculture, being built on trust and shared values. These values will contribute in helping our farmers to feed the world. The Sumi Agro Europe Group is also committed to the further expansion of its network through direct investment and joint ventures, utilizing this integrated corporate strength.

In order to promote sustainability and social wellbeing in accordance with our above mission, the Sumi Agro Europe Group hereby adopts the Sumitomo Corporation Group CSR Action Guidelines for Supply Chain Management set forth below. With a view to further strengthening global relations, which form one of the foundations of our core competence of integrated corporate strength, we request our suppliers and business partners to kindly accept, understand, and practice these guidelines so that together we can achieve responsible value chain management.

Our suppliers and business partners are expected to:

1. Respect human rights and not to be complicit in human rights abuses
2. Prevent forced labour, child labour and the payment of unfairly low wages
3. Not engage in discriminatory employment practices
4. Respect the rights of employees to associate freely in order to ensure open and fair negotiations between labour and management
5. Provide employees with safe and healthy work environments
6. Protect the global environment and give due consideration to biodiversity
7. Ensure the quality and safety of products and services
8. Ensure fair business transactions, to abide by all applicable laws, rules and regulations, and to prevent extortion, bribery and all other forms of corrupt business practices
9. Ensure appropriate information security
10. Cooperate with members of local host communities and contribute to sustainable regional development
11. Disclose information regarding the above in a manner both timely and appropriate.