

**UNANIMOUS WRITTEN CONSENT OF DIRECTORS OF
SUMITOMO CORPORATION OF AMERICAS
TO ACTION TAKEN WITHOUT MEETING**

The undersigned, being all the directors of Sumitomo Corporation of Americas, a New York corporation (the "Corporation"), hereby authorize adoption of and consent to the following resolutions, pursuant to Section 708 (b) of the Business Corporation Law of the State of New York:

WHEREAS, pursuant to section 54(1) of the UK Modern Slavery Act 2015, the board of directors of Sumitomo Corporation, the parent company of the Corporation, approved the attached Sumitomo Corporation Group's modern slavery and human trafficking statement for the fiscal year 2019 (the "Statement").

WHEREAS, the board of directors of the Corporation believes that the Statement is in the best interests of the Corporation.

NOW, THEREFORE, BE IT:

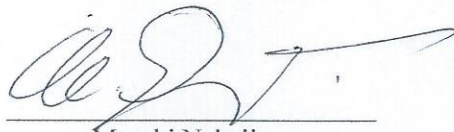
RESOLVED, that the Corporation hereby accepts, approves and adopts the Statement;

RESOLVED FURTHER, that any and all actions heretofore or hereafter taken by any officer of the Corporation, any designee of such officer or any director of the Corporation within the terms of the foregoing resolution are hereby ratified and confirmed as the acts and deeds of the Corporation; and

RESOLVED FURTHER, that each of the officers and directors of the Corporation is hereby authorized to execute and deliver any and all documents and to take such other action as he or she deems necessary, advisable or appropriate to carry out the purposes and intent of the foregoing resolutions.


[Signature Pages Follow]

IN WITNESS WHEREOF, the undersigned have consented as of the 04th day of September, 2020. The electronic signatures by and/or the PDF signature pages of the directors of the Corporation are intended to authenticate the writings of such signatures and to have the same force and effect as manual signatures.



Masaki Nakajima

[Director Nakajima's Signature Page to FY 2019 Anti-Slavery SCOA BOD Written Consent]



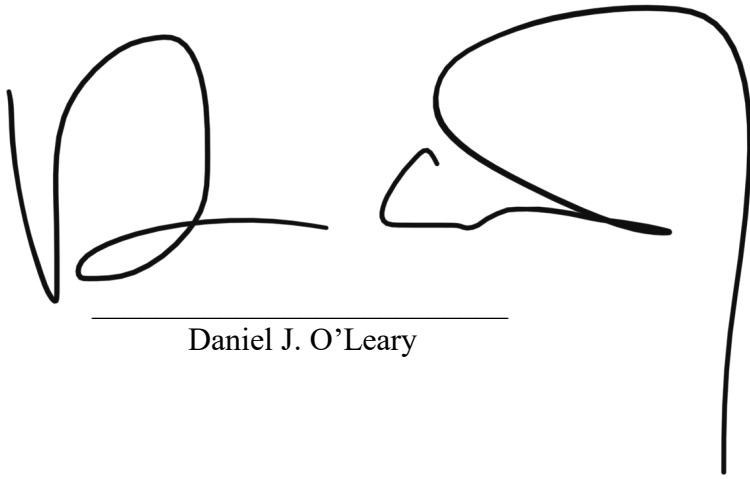
Mitsuhiro Takeda

[Director Takeda's Signature Page to FY 2019 Anti-Slavery SCOA BOD Written Consent]

A handwritten signature in black ink that reads "Timothy E. Sander". The signature is fluid and cursive, with the first name "Timothy" and last name "Sander" being more prominent than the middle initial "E".

Timothy E. Sander

[Director Sander's Signature Page to FY 2019 Anti-Slavery SCOA BOD Written Consent]




Handwritten signature of Daniel J. O'Leary, consisting of a stylized 'D' and 'J' followed by a horizontal line and a large, sweeping 'O' and 'L'.

Daniel J. O'Leary



Handwritten signature, possibly reading 'D. J. O'Leary', with a stylized 'D' and 'J' followed by a horizontal line and a large, sweeping 'O' and 'L'.



Nobuhiro Yoshida

[Director Yoshida's Signature Page to FY 2019 Anti-Slavery SCOA BOD Written Consent]

A handwritten signature in black ink, consisting of a series of fluid, connected strokes that form a stylized representation of the name.

Kazuaki Tsuda

[Director Tsuda's Signature Page to FY 2019 Anti-Slavery SCOA BOD Written Consent]

Sumitomo Corporation Group

Slavery and Human Trafficking Statement for the Fiscal Year 2019

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 2019 ended March 31, 2020. 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 21, 2020.

Background and organisational structure

SC Group is an integrated corporate group committed to business activities in a wide range of industries with around 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.

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.

[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 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 “Reinforcement of Management Bases” in [the Medium-Term Management Plan 2020](#), 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, 2020

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;

- Bristol Fruit Sales (Bananas) Ltd.
- Edgen Group Inc.
- Edgen Murray Europe Ltd.
- Emerald Grain Pty Ltd.
- Eryngium Ltd.
- Fyffes Bananas (Swords) Ltd.
- Fyffes BV
- Fyffes Group Ltd.
- Howco Group Plc
- Kienle + Spiess GmbH
- Moto-Pfohe Eood
- SC Foods Co., Ltd.
- Sumi Agro Europe Ltd.
- Sumi Agro Ltd.
- Sumisho Aero-Systems Corporation
- Sumitomo Corporation Power & Mobility Co., Ltd.
- Sumitomo Corporation Asia & Oceania Pte. Ltd.
- Sumitomo Corporation Europe 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 Motors Ljubljana, Export-Import-Distribucija, D.O.O.
- Summit Motors Slovakia, Spol.S.R.O.
- Summit Pharmaceuticals Europe Ltd.
- Summit Pharmaceuticals International Corporation
- Tecnologia Para la Construcción Y Minería S.L.

Appendix. Initiatives of each Sumitomo Corporation Group company in response to UK Modern Slavery Act

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> <ol style="list-style-type: none"> 1) Active participation as a board member company of the Global Compact Network Japan, a local network of the United Nations Global Compact 2) In fiscal 2019, SC conducted training for 209 new employees, 39 new team leaders, 27 new general managers, and 304 locally hired abroad SC Group employees on sustainability promotion, including respect for human rights. And also, we created our own e-Learning related to business and human rights, and as of May 21st, 2020, a total of 5,234 people, including group employees mainly with SC executives and employees, completed the training. <p>https://www.sumitomocorp.com/en/jp/sustainability/csr#03</p>
Bristol Fruit Sales (Bananas) Ltd. Fyffes Bananas (Swords) Ltd. Fyffes BV Fyffes Group 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 the company's website.</p> <p>https://www.fyffes.com/caring-and-sharing/modern-day-slavery</p> <ol style="list-style-type: none"> 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. 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. 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. 4) In 2019, Fyffes rolled-out 'Fyffes Responsible Business Conduct 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 addition, Fyffes made available to both internal and external stakeholders, a grievance mechanism 'the Fyffes Ethics Hotline', an independent, confidential online and telephone hotline for reporting unethical behaviour by a Fyffes employee. <p>https://www.fyffes.com/who-we-are/our-principles</p> <p>https://secure.ethicspoint.com/domain/media/en/gui/56812/index.html</p> <ol style="list-style-type: none"> 5) Fyffes is the largest supplier of certified Fairtrade bananas in Europe and we have 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%. 6) Rolling-out a 'Global Human Rights Policy and Statement' and bringing it to life through training and internal protocols. <p>https://www.fyffes.com/resource-centre/download/Global_Human_Rights_Policy.pdf</p> <ol style="list-style-type: none"> 7) In 2019, they conducted their first corporate-wide human rights impact assessment (HRIA) including a review of modern slavery risks across their supply chain, in line with the UN Guiding Principles on Business and Human Rights, through the global non-profit organisation BSR. Fyffes chose five countries to do an in-depth analysis – Belize, Colombia, Costa Rica, the Dominican Republic and Honduras. As the result, two risk areas relevant to Modern Slavery were identified; 'child labour' and 'migrant workers labour violations and forced labour' and a third indirectly related area; 'access to a grievance mechanism'. <p>Regarding 'child labour', developing a Child Labour Remediation Protocol during 2020 and ensuring this adopted by key personnel to take swift action in the event of the discovery of a child in the workplace.</p> <p>Regarding 'migrant workers labour violations and forced labour', vulnerable Haitian migrants in the Dominican Republic, it need to be ensured that these workers understand their rights, including basic benefits, in their own language.</p> <p>Regarding 'access to a grievance mechanism', to run a broader campaign internally to make sure all employees are fully aware of that mechanism, including training.</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.	<p>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> <p>https://www.edgenmurray.com/userfiles/ModernSlaveryStatement.pdf</p>
Emerald Grain Pty Ltd.	<p>While acknowledging the SC Group's statement, to comply with the Australian MSA, the report including followings will be approved by the company's board of directors and submitted to the Australian government.</p> <ol style="list-style-type: none"> 1) Formed a Modern Slavery Committee 2) Reviewed the Modern Slavery Act 2018 3) Reviewed its Supply Chains 4) Undertaken Due diligence of high risk supplier groups: Following subjects to further review in FY2021 <ul style="list-style-type: none"> -searched entire supplier list for FY2019 period; -ranked supplier types according to value; -performed a risk assessment of supplier groups and assigned MS risk ratings based on country of origin, industry and product/goods; -gave each supplier group a risk rating which is the basis for priority of phase 2 due diligence by supplier; and -of \$388mil of supplier spend, 4 preliminary medium risk categories were determined namely, export logistics suppliers, IT suppliers, grower suppliers and grain traders. 5) Amended its Purchase T&Cs to include a modern slavery clause.
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	<p>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> <p>https://www.howcogroup.com/images/pdf/Howco_Anti-Slavery_&_Human_Trafficking.pdf</p>
Kienle + Spiess GmbH	<p>By signing two MD members 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.</p> <p>https://www.kienle-spiess.de/kienle-spiess-home-en.html</p>

Moto-Pfohe Eood	By signing two MD members 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
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. http://www.scfoods.co.jp/english/aboutus/outline.html 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) 2) Applying 1) to new suppliers, and existing supplier is checked at the time of regular factory survey
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. http://www.sumiagro.com/ 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
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
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 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.	By signing the Managing Director 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. https://www.sumitomocorp.com/en/easia/sustainability/csr#03
Sumitomo Deutschland GmbH	By signing the Managing Director 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 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/ SEPL is currently putting into place policies designed to ensure that: 1) Its supply chain reflects SEPL's values and respect for the importance of the protection and advancement of human rights; 2) There are due diligence processes in relation to slavery and human trafficking in its business and supply chain; 3) Identification of the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk; 4) The policies are effective in ensuring that slavery and human trafficking is not taking place in its business or supply chains; 5) There is adequate training about slavery and human trafficking available to its employees
Summit Motors Ljubljana, Export-Import-Distribucija, D.O.O.	By signing 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.	By signing the President & MD to the SC Group statement, and its importance and purpose were recognized by its senior management. No company website
Summit Pharmaceuticals 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://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. https://www.summitpharma.co.jp/english/index.html (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.)
Tecnologia Para la Construcción 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

2019 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きます。

本声明は、[英国現代奴隷法](#)に従い、住友商事グループの2019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2020年8月21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カ国以上に約130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、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。

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、以下のような取り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。

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 2020における「経営基盤の強化」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。

2020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。

- Bristol Fruit Sales (Bananas) Ltd.
- Edgen Group Inc.
- Edgen Murray Europe Ltd.
- Emerald Grain Pty Ltd.
- Eryngium Ltd.
- Fyffes Bananas (Swords) Ltd.
- Fyffes BV
- Fyffes Group Ltd.
- Howco Group Plc

- Kienle + Spiess GmbH
- Moto-Pfohe Eood
- SC Foods Co., Ltd.
- Sumi Agro Europe Ltd.
- Sumi Agro Ltd.
- Sumisho Aero-Systems Corporation
- Sumitomo Corporation Power & Mobility Co., Ltd.
- Sumitomo Corporation Asia & Oceania Pte. Ltd.
- Sumitomo Corporation Europe 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 Motors Ljubljana, Export-Import-Distribucija, D.O.O.
- Summit Motors Slovakia, Spol.S.R.O.
- Summit Pharmaceuticals Europe Ltd.
- Summit Pharmaceuticals International Corporation
- Tecnologia Para la Construcccion Y Minería S.L.

付属書. 英国現代奴隷法に対する住友商事グループ各社の取組み

Sumitomo Corporation	<p>SCグループ声明で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>②2019年度に実施した研修として、新入社員209名・新任チームリーダー39名・新任部長27名およびグループ会社の海外現地採用社員304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、2020年5月21日現在、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。</p> <p>https://www.sumitomocorp.com/en/jp/sustainability/csr#03</p>
<p>Bristol Fruit Sales (Bananas) Ltd.</p> <p>Fyffes Bananas (Swords) Ltd.</p> <p>Fyffes BV</p> <p>Fyffes Group Ltd</p>	<p>Fyffesグループとして、SCグループ声明を支持すると共に、The California Transparency in Supply Chains Actへの対応を兼ね、同社取締役会で決議した独自Fyffesグループ声明を同社HP上で公開</p> <p>https://www.fyffes.com/caring-and-sharing/modern-day-slavery</p> <p>①SMETAタイプの監査をサプライチェーン上で実施（246サイトの過半がSEDEX会員。全熟成施設に事前通告なしでSMETA監査を実施。）</p> <p>②Fyffes Group Ltd.では2016年以降、人材派遣業者に対する監査を継続実施</p> <p>③監査の結果、問題業者には早急なremedial actionを求め、応じない場合には当該業者との契約を解除（2020年、コンプライアンス違反を理由に仕入先1社との取引を一時停止したが、状況が改善した為、取引を再開）</p> <p>④Fyffes Responsible Business Conduct Principlesを2019年に制定。第三者が運営するethics hotlineを開設</p> <p>https://www.fyffes.com/who-we-are/our-principles</p> <p>https://secure.ethicspoint.com/domain/media/en/gui/56812/index.html</p> <p>⑤欧州最大のFairtrade認証バナナ取扱量であり、米国向けに同認証メロンを輸出。パイナップル全取扱量とバナナ取扱量25%がRainforest Alliance認証。</p> <p>⑥Global Human Rights Policy and Statementを作成・公開し、社内研修やinternal protocolで実現していく</p> <p>https://www.fyffes.com/resource-centre/download/Global_Human_Rights_Policy.pdf</p> <p>⑦2019年、BSRの協力を得て、国連ビジネスと人権に関する指導原則に沿って、全社的な人権影響評価（HRIA）を実施し、サプライチェーンの現代奴隷制リスクを調査（特にBelize, Colombia, Costa Rica, The Dominican Republic, Hondurasを詳細調査）。調査の結果、現代奴隷関連では「児童労働」と「移民労働者の労働違反と強制労働」に関するリスクが高く、「苦情処理メカニズムへのアクセス」に課題あり。児童労働に関しては、2020年中にChild Labour Remediation Protocolを作成し、主担当を設置予定。移民労働者の労働違反と強制労働に関しては、特に脆弱なハイチ移民への言語的配慮が必要。苦情処理メカニズムについては、研修等で全社員が認知し活用できるようにする。</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.	<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>https://www.edgenmurray.com/userfiles/ModernSlaveryStatement.pdf</p>
Emerald Grain Pty Ltd.	<p>SCグループ声明を支持すると共に、豪MSA対応の為、以下内容の報告を同社取締役会で決議し、豪政府に提出予定</p> <p>① 現代奴隷委員会を創設</p> <p>② 豪MSA対応に関する検討</p> <p>③ サプライチェーンにおける人権侵害リスク調査について検討</p> <p>④ 高リスク・サプライヤーに対し、人権Due diligenceを実施：以下については2021年度に再評価を予定</p> <ul style="list-style-type: none"> - 2019年度サプライヤーリストの精査 - サプライヤーを取引高でランク付け - サプライヤーの所在国／業界／製品・商品に基づいてリスク評価を実施し、現代奴隷リスク格付を実施 - 各サプライヤーにデューデリジェンスの第二段階となる優先順位の基礎となるリスク格付を実施 - 取引高がAUD388mil以上のサプライヤーに関し、4つの予備的な中程度のリスクカテゴリ「輸出物流サプライヤー／ITサプライヤー／栽培者サプライヤー／穀物トレーダー」を設定 <p>⑤ 現代奴隷条項の追加等、売買契約書を見直し</p>
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	<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>https://www.howcogroup.com/images/pdf/Howco_Anti-Slavery_&_Human_Trafficking.pdf</p>
Kienle + Spiess GmbH	<p>取締役会なく、SCグループ声明へのMD2名署名により、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</p> <p>https://www.kienle-spiess.de/kienle-spiess-home-en.html</p>

Moto-Pfohe Eood	取締役会なく、SCグループ声明へのMD2名署名により、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
SC Foods Co., 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 http://www.scfoods.co.jp/aboutus/outline.html 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） 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
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 http://www.sumiagro.com/ ①新グループ規程（CSR Action Guideline for Supply Chain Management）を導入（FY2016） ②SAE社長署名入り方針レターを全仕入先に出状（FY2016） 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 ④SAE全役職員はじめSALにおいても強制労働や人身売買に関するVeite Free E-Learningを受講
Sumisho Aero-Systems Corporation	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
Sumitomo Corporation Power & Mobility Co., 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.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（個別に必要に応じて各拠点の担当者へ連絡） 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 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。 https://www.sumitomocorp.com/en/us/sustainability/csr#03 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。
Sumitomo Corporation Saudi Arabia Ltd.	取締役会なく、MD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 https://www.sumitomocorp.com/en/easia/sustainability/csr#03
Sumitomo Deutschland GmbH	取締役会なく、SCグループ声明へのMD署名により、本意義・目的を経営層で認識。 https://www.sumitomocorp.com/en/europe/sceu/csr#02
Sumitomo Shoji Chemicals Co., 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.sc-chem.co.jp/sustainability/csr/
Summit Agro International 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 http://www.summit-agro.co.jp/company/contribution.html （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、信用調書におけるチェックなど）
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.	GD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.	President&MD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なし
Summit Pharmaceuticals 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://summitpharmaeurope.com/about-us/our-responsability/
Summit Pharmaceuticals International Corporation	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.summitpharma.co.jp/japanese/ （MSAの意義・目的を取締役・営業本部長・営業部長に再度説明し、職制を通じて社内周知）
Tecnologia Para la Construccion 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