

Sumitomo Electric Group

SUPPLIER CODE OF CONDUCT

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The Sumitomo Spirit

Banji-nissei – Do your sincere best, not only in business but in every aspect of your life.

Shinyo-kakujitsu – Place importance on integrity and good management.

Fusu-furi – Never sacrifice integrity for easy profits.

Sumitomo Electric Group Supplier Code of Conduct

For more than 120 years, the Sumitomo Electric Group (“SEG”) has been guided by the Sumitomo Spirit, with its emphasis on integrity and business ethics. SEG seeks to contribute to society through fair and sustainable business activities, and to do business with suppliers who share its commitment to integrity and business ethics.

This Supplier Code of Conduct (“Code”) sets out SEG’s expectations of our suppliers, which includes suppliers, subcontractors, agents, consultants, distributors or any other party that receives payments from SEG for its products or services.

At SEG, we recognize that our suppliers play an important role in our overall success. We appreciate the contributions that our suppliers make to our business. We choose to do business with suppliers that share our commitment to integrity and to conducting business in compliance with the law. SEG asks that our suppliers conduct business in a manner that is consistent with the principles set out below and that they cascade similar expectations throughout their own supply chains.

Commitment to Compliance with the Law

SEG expects our suppliers to conduct their business activities in compliance with all applicable laws and regulations.

We Expect Compliance with Anti-Corruption Laws

Bribery causes enormous harm to communities, and it can cause significant damage to SEG. SEG expects our suppliers to comply with all applicable anti-corruption laws. In addition, when a supplier interacts with a government official on behalf of SEG, the supplier is absolutely prohibited from offering, giving, or receiving anything of value, directly or indirectly, to obtain an improper business advantage.

We Expect Compliance with Competition Laws

SEG is committed to compliance with competition and antitrust laws, and we expect a similar level of commitment from our suppliers.

We Expect Protection of SEG’s Intellectual Property

SEG expects our suppliers to protect any SEG intellectual property that is obtained during the course of our relationship.

We Expect Compliance with International Trade Laws

SEG is proud to be a global company and to have suppliers located around the world. We expect our suppliers to respect applicable import and export laws and regulations and other international trade requirements.

Commitment to Responsible Sourcing**Engagement with Supply Chain**

Sustainable management of supply chains is of growing importance to our stakeholders, including customers and investors. We have set social and environmental requirements for our suppliers for many years. We will continue our cooperation with suppliers, and we will increase our engagements in strategic areas, all to improve sustainable capabilities in the supply chain.

Conflict Minerals

In particular, SEG requires our suppliers to take appropriate steps to determine if their products contain conflict minerals (tin, tantalum, tungsten, and gold) and, if so, to implement processes to identify the sources of these minerals and otherwise comply with all applicable laws and regulations governing the sourcing and use of conflict minerals. We expect suppliers to eliminate the use of conflict minerals that – directly or indirectly – finance or benefit armed groups in the Democratic Republic of Congo (the “**DRC**”) and adjoining countries.

Responsible and Sustainable Sourcing Practices

The DRC is also the world’s largest producer of cobalt. Cobalt extraction raises similar concerns to conflict minerals and has also become a concern.

We encourage our suppliers to use responsible and sustainable practices to source all raw materials, including cobalt and other minerals. We encourage all suppliers to take into account evolving international standards and developments regarding environmental issues, human rights, and other social problems, particularly in conflict-affected and high-risk areas.

Commitment to People

SEG is committed to respecting human rights. Our commitment includes identifying, preventing and mitigating adverse human rights impacts of our activities. We expect our suppliers to share the same respect for human rights, including a commitment to generally recognised international human rights standards.

We Expect Compliance with Employment Laws

SEG expects our suppliers to comply with all applicable laws regulating work hours, wages, benefits and other terms and conditions of employment, including employment contracts, if applicable.

We Oppose the Use of Forced Labor

SEG will not work with suppliers who – directly or indirectly – use slave labor, or any other form of forced, coerced or involuntary labor in their workforce. Suppliers should never ask employees or any member of their workforce to surrender their passports, government-issued identifications, or work permits as a condition of employment.

We Oppose the Use of Child Labor

SEG will not work with suppliers who – directly or indirectly – use illegal child labor in carrying out their business. For these purposes, “child” refers to anyone under the minimum legal age for employment where the work is performed, but in any event SEG will not work with suppliers whose direct or indirect workforces include children under the age of 15 years.

We Oppose any Form of Human Trafficking

SEG will not work with suppliers who directly or indirectly engage in the trafficking of people.

We Oppose Harassment

SEG expects our suppliers to treat their workforce with the dignity and respect to which all human beings are entitled. Suppliers should create a work environment that does not tolerate harassment or other abusive conduct toward employees.

We Oppose Discrimination and Encourage Diversity

SEG expects our suppliers to provide equal employment opportunities to employees and applicants for employment without unlawful discrimination based on race, ethnicity, national origin, religion, age, gender, gender identity, sexual orientation, disability, or any other characteristic protected by applicable laws.

SEG encourages its suppliers to promote diversity and to foster an inclusive and ethical culture within its workplace.

We Respect Workers' Rights of Association

SEG expects our suppliers to respect the rights of workers to associate or not to associate in accordance with applicable law.

We are Committed to Safe Work Environments

SEG expects our suppliers to protect the health, safety and welfare of their people, visitors, and others who may be affected by their activities. Suppliers must comply with all applicable workplace health and safety laws and regulations.

We Expect that Personal Data will be Protected

SEG expects our suppliers to observe all applicable laws that require the protection of the personal data of employees, customers and other parties. In addition, suppliers must promptly notify SEG of any breach of data privacy law by a supplier or any party that the supplier does business with that affects SEG.

Commitment to Society

We are Committed to Protecting the Environment

SEG is committed to environmental stewardship and to reducing the environmental impact of our activities. We expect our suppliers likewise to reduce the environmental impact of their business operations, to manage the risks of environmental harm, and to comply with all applicable environmental laws and regulations. SEG encourages its suppliers to pay particularly close attention to: the reduction of greenhouse gases, increasing energy efficiency, the use of renewables, the efficient use of energy, water and raw materials, and the adoption of sustainable resources management and waste reduction processes.

We are Committed to Advancing the Communities Where We Operate

One of SEG's corporate principles is that we contribute to creating a better society and environment, with a firm awareness of our social responsibility. We expect a similar commitment from our suppliers.

Commitment to Compliance and Business Ethics

We Expect Suppliers to Provide Employees with a Means to Report Concerns

SEG expects its suppliers to provide employees with avenues for raising suspected violations of law or other concerns without fear of retaliation. We further expect that suppliers will respond to concerns appropriately.

We Expect Suppliers to Maintain Accurate Business Information

We expect suppliers to complete all business documents (including quality documents) accurately, truthfully, and in a timely manner. We also expect our suppliers to make full, fair, accurate, and timely disclosures in reports and documents filed with government regulators, including any periodic financial reports. We expect that, when applicable, suppliers' documents must be properly authorized. In addition, we expect that any recording of suppliers' financial activities be in compliance with applicable laws and accounting practices. Suppliers must not make false or misleading entries in their documents and records and never omit information from their records that they are required to record.

We Expect Suppliers to Adopt Appropriate Compliance and Ethics Initiatives

To the extent possible and in a manner that is commensurate with the size and nature of their businesses, SEG expects suppliers to adopt effective compliance and ethics programs of their own. SEG encourages its suppliers to implement their own codes of conduct and to foster a culture of compliance and business ethics in their organizations, including avoiding conflicts of interest.

Issues Related to this Code

Suppliers (or their employees) may inform SEG of concerns related to issues governed by this Code. If there are any concerns under this Code, we encourage you to reach out to your primary business contact. If that is not appropriate, please contact the hotline at <https://sumitomoelectric.com/compliance-hotlines>.

SEG reserves the right to conduct an audit/review of the supplier to ensure conformity to this Code.

Because SEG seeks to do business with suppliers who share our commitment to compliance with law and ethical, responsible business practices, we will review the terms of our business relationships if we become aware that a supplier has violated the law or failed to comply with this Code. To this end, SEG may request information related to our suppliers' compliance with this Code.

If you have questions about this Code, please feel free to contact scoc-queries@info.sei.co.jp.