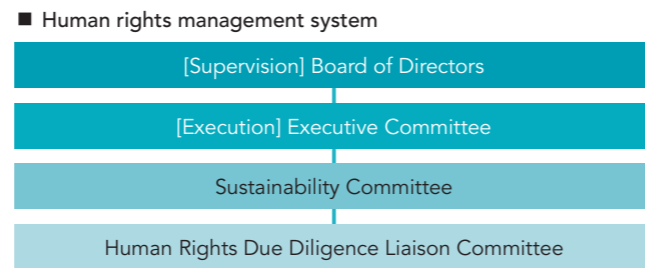


# Respect for Human Rights

## 1. Human Rights Management in the SuMi TRUST Group

In accordance with our Human Rights Policy, our Group identifies and assesses negative impacts on human rights and promotes initiatives to prevent and mitigate such impacts. As part of our human capital management, we continue to implement measures such as fair evaluation and treatment, maintaining the workplace environment, promotion of health management, and promotion of diversity, equity, and inclusion.



## 2. Human Rights Policy and Risk Awareness

### (i) Human Rights Policy

We formulated our Human Rights Policy based on the "Guiding Principles on Business and Human Rights" adopted by the United Nations Human Rights Council in 2011. In light of the increased importance of respecting human rights, as well as the expanded human rights issues required of financial institutions, we revised our human rights policy in

February 2023.

**Human Rights Policy**  
[https://www.smtg.jp/english/sustainability/management/human\\_rights\\_policy](https://www.smtg.jp/english/sustainability/management/human_rights_policy)

### (ii) Identification of material human rights risks

In conjunction with the revision of our Human Rights Policy, we confirmed risks that our business activities could have on human rights to identify the following three as material human rights risks from the perspectives of the "scope of impact" and "severity."

- Prejudice and discriminatory views, including the Dowa issue (discrimination against a certain group of domestic Japanese)
- Forced labor, child labor, and human trafficking
- Involvement in conflicts and inhumane acts

## 3. Human Rights Due Diligence

### (i) Survey of Group companies

In order to understand our Group's human rights issues, each Group company strives to identify human rights issues concerning its directors and executive officers, employees, and business partners and suppliers, and take improvement measures, if necessary, once a year, utilizing the "Human Rights Due Diligence Checklist." In fiscal 2024, the number of cases with problems reported in detail is shown in the table on the right. Based on these results, the Human Rights Due Diligence Liaison Committee has deliberated and reflected the findings in improving the system and the themes

of human rights enlightening training.

Category	FY2023	FY2024
Violation of workers' rights (mainly the right to fair and impartial evaluation)	7	16
Occupational health and safety	68	31
Discrimination/harassment	91	56
Infringement on the lives and culture of local residents	0	1
Invasion of privacy	1	1
Human rights risk in investees, borrowers, suppliers, etc.	1	4

### (ii) Survey of external stakeholders

In order to conduct responsible corporate behavior, SuMi TRUST Bank introduced business flows utilizing external data in November 2023 for risks mainly related to environmental and societal issues. SuMiTB conducts fact-finding surveys in cases where it is deemed necessary to prevent or mitigate negative impacts.

Based on the results of these surveys, SuMiTB determines whether monitoring is necessary, and continues dialogue

with the companies subject to monitoring to prevent or mitigate negative impacts. In addition, through dialogue with NGOs and other stakeholders, we have identified and evaluated negative impacts and we are promoting efforts to reduce them. In the future, we will work to expand the scope of target operations and instill the significance of such efforts in its employees.

### (iii) Human rights training

Our Group recognizes that it is important for our directors, executive officers, and employees to enhance their understanding of human rights issues and work with a sense of ownership, and that continuing efforts are necessary.

Since fiscal 2023, SuMi TRUST Bank has clarified the role expected for each position. Additionally, SuMiTB has introduced new training aimed at raising the awareness of human rights issues among the top management and managers based on the existing training by position, promoting more effective initiatives.

In fiscal 2024, SuMiTB conducted training aimed at raising awareness of and establishing our Human Rights Policy and

material human rights risks.

#### ■ FY2024 Human rights training

Training for executives	Prohibition of discrimination against persons with disabilities Neurodiversity
Training for general managers and deputy general managers	The Dowa issue in light of the Human Rights Policy and material human rights risks
Employee training	The Dowa issue in light of the Human Rights Policy and material human rights risks

### (iv) Human Rights Due Diligence Liaison Committee

The Human Rights Due Diligence Liaison Committee fully discusses issues identified through the above process, leading to the formulation and implementation of concrete improvement measures.

Based on the Human Rights Policy, the committee investigates each Group company's human rights related responses, identifies issues which need a response, and discusses improvement measures with the aim of promoting efforts to respect human rights.

#### ■ Major deliberations in the Human Rights Due Diligence Liaison Committee during FY2024

July 2024	<ul style="list-style-type: none"> <li>• Fact-finding survey of human rights issues at Group companies, and responses of the personnel consultation desk</li> <li>• Fact-finding survey of external stakeholders, and responses of the grievance consultation desk</li> <li>• Monitoring results of the UK's Modern Slavery Act in FY2023</li> </ul>
January 2025	<ul style="list-style-type: none"> <li>• Fact-finding survey of human rights issues at Group companies, and responses of the personnel consultation desk</li> <li>• Fact-finding survey of external stakeholders, and responses of the grievance consultation desk</li> </ul>

## 4. Grievance Mechanism

### (i) Details of the grievance mechanism

SuMi TRUST Bank has a personnel consultation desk (LGBTQ Consultation Desk) and a compliance hotline in place to provide consultation on various human rights issues. Anyone can consult anonymously using these measures. In addition to protecting the privacy of those seeking consultation, if any negative impact on human rights becomes clear in a consultation or report, necessary measures will be taken promptly in cooperation with the relevant departments.

### (ii) Compliance Hotline

Our Group's Compliance Hotline enables directors, executive officers, and employees to directly report legal violations to the FD and Compliance Department or external law firms. The system ensures protection of whistleblowers, and simple means of reporting (the web system and telephone calls to external law firms) have been established. We cooperate with the personnel consultation desk to respond to reports of harassment and other human rights issues.

#### ■ Number of consultations received at the personnel consultation desk in FY2024

	Number of consultations	Number of outstanding consultations
Total	103	20
Harassment concerns	40	16
Power harassment	36	15
Sexual harassment	3	1
Maternity harassment, Care harassment	1	0
Human resources (including employment)	15	1
Organizational operation	18	1
Human relationships (including health-related)	13	2
General inquiry (System, etc.)	17	0

#### ■ Number of consultations reported to the compliance hotline in FY2024

40 (the number of consultations related to human rights reported to the compliance hotline, including those from the Group companies)

Please refer to (Q.P.95) for details of the compliance hotline system.