SUMCO Human Rights Policy

Based on our mission statement, "To be the world's No.1 silicon wafer supplier by exceeding the expectation of our customers and stakeholders, by recognizing the value of our employees and by being good neighbors in communities", the SUMCO Group establishes "SUMCO Human Rights Policy" to respect human rights of all people associated with the SUMCO Group and fulfill our social responsibility as a corporate citizen.

1. Scope

(1) This Policy applies to all officers and employees of the SUMCO Group.

(2) We share this policy with all of our stakeholders and encourage them to support our initiatives to respect human rights.

2. Respect for international norms/standards of human rights

We commit to respect internationally recognized human rights in the International Bill of Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, United Nation Guiding Principles on Business and Human Rights, and/or OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and we also promote initiatives based on these international norms/standards. Furthermore, in promoting efforts to respect human rights throughout our supply chain, we refer to RBA (Responsible Business Alliance) Code of Conduct.

3. Initiatives for respecting human rights

We set the following issues as priority themes and promote initiatives for respecting human rights.

- Prohibition of forced labor and any other involuntary labor
- Prohibition of child labor and engagement of young workers in dangerous work
- Compliance with the any applicable labor laws and regulations covering working time, holiday, wages, etc.
- Prohibition of discrimination based on any factors.
- Prohibition of harassment and slander

- Appropriate management of personal information and protection of privacy
- Respect for freedom of association
- Providing safe and hygienic working environment
- Pollution prevention and compliance with any applicable environmental laws and regulations
- Pursuit of quality and reliability

4. Initiatives to establishment

We apply and reflect this policy to other related policies, rules, regulations, and procedures, and provide appropriate training and education to all officers and employees of the SUMCO Group.

5. Promoting Human Right Due Diligence

We regularly promote human rights due diligence to identify and evaluate negative impacts on human rights caused by our business activities.

6. Correction/Remedy

(1) When it is revealed that our business activities caused or contributed to negative impacts on human rights, we will take necessary steps to correct/remedy the impact through any appropriate and effective measures and implement prevention measures.

(2) To understand the negative impacts on human rights caused or contributed by our business activities, we prepare and operate the whistle-blowing system which are available for not only our employees but also our suppliers.

7. Dialogue with stakeholders and external experts

We have a dialogue with stakeholders and external experts to improve our initiatives to respect human rights based on this policy.

8. Governance

Initiatives to respect human rights based on this policy and the status of compliance with this policy are supervised by the Executive Officer Responsible for Sustainability Promotion and regularly reported to the Board of Directors.

9. Disclosure

We disclose our initiatives to respect human rights based on this policy on our website, etc.

March/27/2026

SUMCO Corporation

Representative Director, President

Jiro Ryuta