Rubber and Beyond, Driving Our Future

SUMITOMO
RUBBER INDUSTRIES

The contents of this pamphlet are also available for viewing on the Internet.

Sumitomo Rubber Industries, Ltd.
Corporate Ethics Committee Secretariat

Code of Conduct

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Message from the President

President and CEO, Representative Director
Sumitomo Rubber Industries, Ltd.

To All Members of the Sumitomo Rubber Group

In the course of our daily work, we inevitably face situations where we must ask ourselves, "Which is the right choice?"

Should we prioritize speed, or should we take the time to pause and reflect?
The accumulation of these decisions shapes our daily operations and ultimately defines who we are as the DUNLOP Group.

This is why it is essential to have clear guiding principles when making decisions.

At the DUNLOP Group, "Our Philosophy" serves as the foundation for our actions and decisions. While it does not provide a single correct answer in every situation, it offers a framework to return to when we are in doubt. This philosophy underpins not only our short-term strategies and mid-term plans, but also our long-term management strategy, R.I.S.E. 2035.

Today, corporate value is no longer measured solely by financial performance. Companies are increasingly evaluated on their ability to operate sustainably, their contribution to society, and whether they are trusted by stakeholders. Concepts such as compliance and sustainability are integral to this evaluation. Companies that fail to put these principles into practice will not be able to succeed over the long term.

In this context, one principle we particularly emphasize is "Bad News First / Fast."
By sharing bad news promptly, we enable swift responses and help minimize potential risks to the company.

If you notice any potential issues or feel a sense of concern, please speak up as early as possible. Even if it ultimately proves not to be a significant problem, raising the concern itself is meaningful and important.

If you encounter a situation that may violate the Code of Conduct, do not hesitate to report it, or seek guidance from your manager or through the Corporate Ethics Helpline. As members of the DUNLOP Group, we all share the responsibility to understand and comply with the Code of Conduct. The company will treat all good-faith reporters appropriately and strictly prohibits any form of retaliation or unfavorable treatment.

If you are ever unsure about how to proceed, please do not handle the situation alone. The DUNLOP Group offers a supportive environment where you can consult colleagues across functions and levels.
Throughout my career, I have learned the importance of communication. Challenges that cannot be solved individually can be overcome through collaboration. It is the accumulation of each individual's decisions and actions that sustain the DUNLOP Group.
Whenever you are in doubt, return to "Our Philosophy" and the Code of Conduct as your guide.

Let us continue to make thoughtful decisions and act with integrity in our daily work.

March 26th, 2026

The Relationship Between "Our Philosophy" & Our "Code of Conduct"

Our Philosophy: The Corporate Philosophy Framework of the Sumitomo Rubber Group

In order to ensure the continued growth of our Group during these times of great uncertainty and drastic changes, it is essential that we now return to square one and make perfectly clear the very reason why the Sumitomo Rubber Group exists so that we may then use this reason as our basis for establishing a set of unwavering guiding principles to share with all of our stakeholders and especially among all of our employees. With this lofty goal in mind, we formulated Our Philosophy as a new and improved Corporate Philosophy Framework for the entire Sumitomo Rubber Group, one that builds upon the foundations set by the Sumitomo Business Philosophy, which has been passed down through generations and still lives on to this day.
With Our Philosophy serving as the basis for our every decision and as the impetus for our every action, the Sumitomo Rubber Group will continue striving to improve not only our economic value, but also our value to society so that we may contribute to the realization of a prosperous and sustainable society.

Purpose

Through innovation we will create a future of joy and well-being for all.

Story

A unique belief in the material possibilities of rubber.
A track record of multiple world firsts through industry-leading rubber technology, and beyond that, relentless dedication to the innovation and development of new technologies.
A singular focus on creating value that exceeds expectations in response to the trust our customers and society place in us.
Supporting individuals, society, and the future ;
through innovation creating a future of joy and well-being for all.
We are Sumitomo Rubber Industries, and this is what we are for.

Vision

Uniting our diverse strengths, growing together, driving and thriving on change.

SRI WAY - Values

Being reliable and worthy of trust
Facing forward with honesty and integrity, responding to the trust our customers, our colleagues and our society place in us.

Seeking out challenge
Being unafraid; having the courage to persist in the face of failure.

Valuing one another
Understanding and respecting each other's individuality and perspective.

Slogan

Rubber and Beyond, Driving Our Future

The Sumitomo Business Philosophy

The basis for Our Philosophy is the Sumitomo Business Philosophy, a set of ideals that have been passed down through generations since the founding of the Sumitomo Group some 400 years ago.
The Sumitomo Business Philosophy began as "Monjuin Shiigaki" ("The Founder' s Precepts"), a collection of straightforward business guidelines for merchants that Masatomo Sumitomo (1585–1652) left behind for posterity after founding the business that would become the Sumitomo Group. Over the years, as the Sumitomo Group grew into one of largest conglomerates in Japan, these guidelines continued to develop and expand until they were finally condensed into the more modern "Business Principles," which remain in use throughout the Sumitomo Group to this very day.

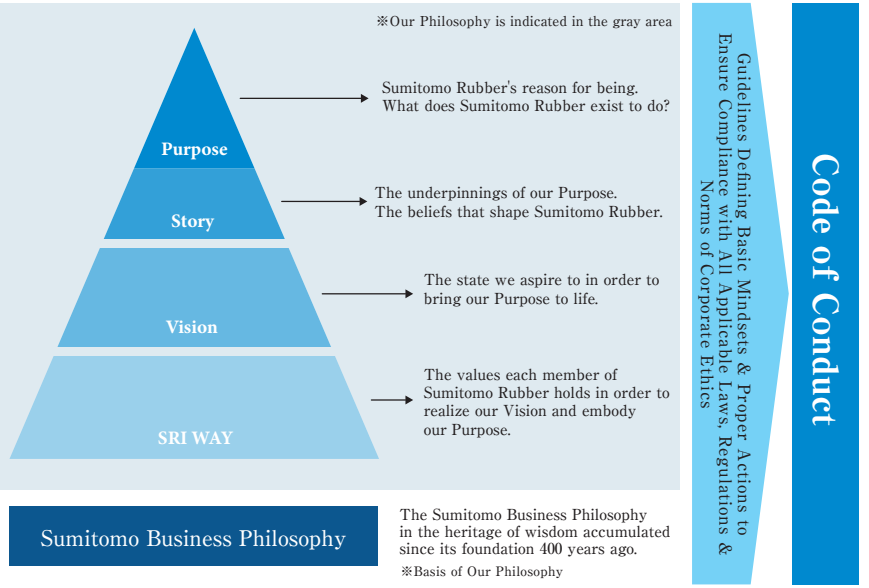
Article 1. Sumitomo shall achieve strength and prosperity by placing prime importance on integrity and sound management in the conduct of its business.

Article 2. Sumitomo shall manage its activities with foresight and flexibility in order to cope effectively with the changing times. Under no circumstances, however, shall it pursue easy gains or act imprudently.

※Modern Translation from "Sumitomo Limited Partnership Administrative Regulations" (Enacted in 1928)

Code of Conduct

Our Code of Conduct is a set of substantive guidelines that explain in easy-to-understand terms the basic mindsets and ideas that underpin the business activities of the Sumitomo Rubber Group, beginning with matters of compliance. We ask that all executives and employees of all companies in the Sumitomo Rubber Group rely on this Code of Conduct as essential criteria for all of the decisions involved in carrying out the business activities of the Sumitomo Rubber Group.



About Our Code of Conduct

Who is subject to our Code of Conduct?

This Code of Conduct applies to all executives and employees of all companies in the Sumitomo Rubber Group.
In addition, we also expect all suppliers who do business with the Sumitomo Rubber Group to act in a manner that is consistent with our Code of Conduct.

Relationship with Local Laws in Each Country

All executives and employees must fully abide by all applicable laws, regulations and rules in every country and region where we operate. Where local laws or regulations differ from the contents of this Code of Conduct, please contact and consult with our Legal Affairs Department.
Some companies in the Sumitomo Rubber Group have established corporate rules whose contents overlap with this Code of Conduct, either in part or in full. Where such corporate rules conflict with this Code of Conduct, the contents of this Code of Conduct shall take precedence.

Our Responsibilities

As members of the Sumitomo Rubber Group:

- We have a responsibility to understand and uphold this Code of Conduct, as well as all corporate policies and other corporate rules.
- Whenever we have any questions or concerns relating to compliance and especially whenever we become aware of any potential violation of applicable laws or regulations, this Code of Conduct or other corporate rules, we have an obligation to contact any one of the contacts for consulting and reporting listed on Pages 6 and 7.
- We need to understand that we may be subject to punishment if we act in a way that contravenes this Code of Conduct.

Responsibilities of Superiors

If you are in a position that involves directing and/or supervising subordinates, you also bear the following responsibilities in addition to those listed above.

- Please always act in a manner that sets a positive example for those around you.
- Please regularly check with members of your workplace to ensure that they not only understand the importance of this Code of Conduct, but also act accordingly at all times.
- Please work to create a work environment where everyone feels free to raise and discuss questions or concerns relating to compliance without hesitation.
- Please listen to members of your workplace when they come to you with questions or concerns relating to compliance while always making sure to take their concerns seriously.
- You have a duty to handle and resolve any compliance concerns that fall within the scope of your authority.
- Upon learning of possible misconduct, you have an obligation to contact any one of the contacts for consulting and reporting listed on Pages 6 and 7.
- Please take the initiative in promoting and advancing groupwide compliance efforts while also actively participating in local compliance efforts at your own place of work.

Compliance Consulting & Reporting

This Code of Conduct does not comprehensively address every situation that may possibly arise. As such, please contact any one of the contacts for consulting and reporting listed on Pages 6 and 7 in all of the following cases.

- When you are unsure about the specific requirements of laws, regulations or corporate policies, etc.
- When you are unsure whether your own actions (or the actions of those around you) are correct.
- When you suspect that your own actions (or the actions of those around you) are wrong.

Should you suspect or become aware of any violation of applicable laws or regulations, this Code of Conduct or other corporate rules, etc., then you have an obligation to report this. Duly reporting suspected or actual misconduct or other problems serves to protect your company, your coworkers and your community.

Bad News First/Fast

"Bad News" (i.e. trouble, etc.) demands prompt reporting up the chain of command so that it can be addressed quickly. By contrast, "Good News" can wait.

- Whenever Bad News arises (or appears imminent), please relay the facts as quickly as possible and without hiding or distorting anything.
- In certain cases, failure to practice "Bad News First/Fast" may be subject to punishment.
- On the other hand, our rules dictate that practicing "Bad News First/Fast" will never reflect poorly on you, even if the news that you reported is not as bad as you had thought or does not turn out as you had expected.
- At the same time, bosses and executives bear an obligation to strive to create a work environment that facilitates the unimpeded flow of Bad News.

Contacts for Compliance Consulting & Reporting

Superiors

Please first consult with your direct superior for reporting through the chain of command. If you are unable or unwilling to consult with your direct superior for whatever reason, please feel free to consult with one of the other contacts listed on the following.

Legal Affairs Organization

If you have questions about legal compliance or simply wish to know more about legal risks, please contact the organization in your company that is responsible for legal affairs.

Human Resources & General Affairs Organization

If you wish to know more about general compliance concerns or have questions about corporate ethics, please contact the organization in your company that is responsible for human resources and general affairs, as they can support you in finding the best way to address such concerns.

Local Compliance Office & Head Office Corporate Ethics Helpline

The Sumitomo Rubber Group has established a Corporate Ethics Helpline to serve as a central office for collecting information and responding to inquiries concerning potential and actual violations of laws and regulations or norms of corporate ethics.
All Sumitomo Rubber Group employees anywhere in the world, as well as our business partners (i.e. customers, suppliers, etc.) worldwide, may freely contact the Corporate Ethics Helpline for consulting or reporting.
If consulting or reporting from outside of Japan, please contact the Corporate Ethics Helpline by email. (※Gmail and other free email services may also be used to contact the Corporate Ethics Helpline for consulting and reporting.)
Sumitomo Rubber Group employees may choose to contact either their local Compliance Office (where available) or the Corporate Ethics Helpline at the Head Office.
The Sumitomo Rubber Group encourages all employees to make active use of local Compliance Offices or the Corporate Ethics Helpline whenever the need arises.
Please rest assured that your privacy will be thoroughly protected and that you will not receive any form of reprisal or other disadvantageous treatment as a result of having consulted or reported.

Structure of Compliance initiatives

Sumitomo Rubber Group Corporate Ethics Helpline

①Compliance Consultation Office

Telephone:
(+81) 78-265-3133
(+81) 50-3495-8488
Email Address:
helpline@srigroup.co.jp
Mailing Address:
Compliance Consultation Office
Sumitomo Rubber Industries, Ltd.
3-6-9 Wakinohama-cho,
Chuo-ku, Kobe JAPAN
(Postal Code: 651-0072)

②External Liaison Office: Dojima Law Office

Telephone:
(+81) 6-6201-0361
Email Address:
sri.helpline@dojima.gr.jp
Mailing Address:
Dojima Law Office
2-3-9 Kitahama, Chuo-ku,
Osaka JAPAN
(Postal Code: 541-0041)

You can also access information about the Corporate Ethics Helpline online.

So that you may feel comfortable when consulting or reporting, the above offices have both men women on staff who can speak with you if you have a preference.
Please understand that making false reports, etc. with the intention of sabotaging or slandering a particular individual or otherwise abusing the Corporate Ethics Helpline for the furtherance of misconduct is strictly prohibited.

Handling of Consulting & Reporting by the Corporate Ethics Helpline

When you contact the Corporate Ethics Hotline, things will generally play out as follows. However, please note that the actual sequence of events may vary depending on the specifics of the case at hand.

Receipt of Consultation/Report

①We will ensure strict confidentiality while minimizing the number of people involved in an investigation.
Your information will be maintained in strict confidence.
You may consult or report anonymously if you so choose.
You will not receive any form of reprisal or other disadvantageous treatment as a result of your consultation or report.

Investigation

②We will interview the individual who made the initial report and investigate the material facts of the case.
③We will interview other persons involved in the case.
※Where a consultation or report involves accusations or suspicions of compliance infractions committed by a specific individual or individuals, we will also interview the individual(s) in question.
※It is very important that you also maintain confidentiality after consulting or reporting. Sharing information about a case with others increases the likelihood that you will be identified as the person who made the initial report and may cause undue confusion during an ongoing investigation.

Implementing Corrective Action & Measures to Prevent Repeat Incidents

④We will determine the facts with regard to the initial consultation or report and, based on our findings, will take corrective action and implement measures to prevent repeat incidents.

Feedback

⑤We will provide feedback on how the matter was ultimately addressed and resolved to the individual who originally contacted us with a consultation or report.
※This may not be possible in the case of anonymous consulting or reporting.

Follow Up

⑥We will check to make sure that no person has been subjected to any form of reprisal or other disadvantageous treatment as a result of having consulted, reported, facilitated reporting or cooperated with an investigation into the facts of a case.
We will enact appropriate measures for the relief and rehabilitation of any person who has been subjected to reprisal or other disadvantageous treatment for any of the reasons listed above.

Compliance Self-Checks

Whenever you find yourself facing a compliance issue with no clear answers in sight, please be sure to ask yourself the following questions.

- Do you believe that this action is correct?
- Can you tell your family about this with pride because you have nothing to hide?
- Do you think that this is okay only as long as nobody finds out about it?
- If this made the news, would you still be able to explain your actions with confidence?
- Will this action build trust and inspire pride in the Sumitomo Rubber Group?

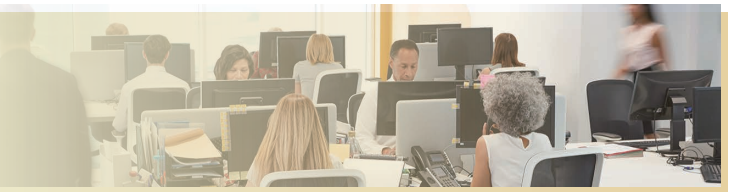
Case Studies

The following is a list of typical situations that you may encounter in the course of your day-to-day work.
Please check to make sure that none of the following descriptions apply to any of your actions.

Negotiations, Meetings & Entertaining with Business Partners

- Are you engaging in discrimination, harassment or other violations of human rights? To P.11
- Are you unilaterally imposing any unfair trade terms on suppliers or contractors or delaying payment when it is due? To P.18
- Are you engaging in any unfair trade practices, such as by taking advantage of monopolies or cartels? To P.17
- Are you providing any form of illicit benefit, entertainment or gifts, etc. to public servants (either local or foreign)? To P.22
- Are you providing any excessive (i.e. beyond generally accepted business practices) entertainment or gifts, etc. to business partners or receiving any excessive entertainment or gifts, etc. from business partners? To P.21
- Are you sharing insider information (either about our Group or our business partners) with any outside party without explicit authorization to do so? To P.24
- Are you involved with antisocial forces in any way, shape or form? Are you involved with money laundering in any way, shape or form? To P.26

Office



- Are you engaging in discrimination, harassment or other violations of human rights? To P.11
- Is the safety and health of workers being given top priority? To P.10
- Are you working (or having your subordinates work) excessively long hours? To P.10
- Are you making any judgments or decisions that deviate from corporate rules? To P.4
- Are you using any IT devices, software or communication network systems, etc. in a manner that is unauthorized or unlawful? To P.13
- Are you engaging in any untoward accounting or bookkeeping practices? To P.23
- Are all corporate secrets (such as information about business partners and personal information) being handled and managed in an appropriate manner? To P.16
- Are you sharing insider information (either about our Group or our business partners) with any outside party without explicit authorization to do so? To P.24

Factories & Other Production Sites

- Are you engaging in discrimination, harassment or other violations of human rights? To P.11
- Is the safety and health of workers being given top priority? To P.10
- Are you working (or having your subordinates work) excessively long hours? To P.10
- In the interests of ensuring product safety, are all relevant laws and regulations, quality standards and specifications agreed with business partners, etc. being followed to the letter? To P.15
- Are all applicable environmental laws and regulations being followed? To P.28
- Is any secret information relating to manufacturing or technology being leaked to outside parties? To P.16

International Relations & Trade

- Are you engaging in discrimination, harassment or other violations of human rights? To P.11
- Are you engaging in any untoward accounting, bookkeeping or tax practices? To P.23
- Are you engaging in any import or export procedures that deviate from the rules set forth in international treaties or applicable laws and regulations? To P.20
- Are you providing any form of illicit benefit to public servants involved in customs clearance? To P.22
- Are you engaging in any imports or exports that are banned by applicable laws or regulations or otherwise taking part in any untoward transactions? To P.20

Ⅰ Relationship Between Company & Employees

Ⅰ-1 Valuing Human Life & Maintaining Safety & Health

The Sumitomo Rubber Group considers each and every one of our employees to be an invaluable asset supporting the continued growth and development of our business. As such, we value the lives of our employees and strive to create workplaces where everyone can work in safety, good health and peace of mind.

- Considering "Safety" and "Health" to take precedence over all other considerations, the Sumitomo Rubber Group actively implements safety systems and installs facilities and equipment designed to prevent occupational accidents so that we may ensure the safety and health of all of our employees.
- Believing that maintaining the mental and physical health of our employees is key to the continued growth and development of our business, the Sumitomo Rubber Group promotes "Health & Productivity Management" and strives to create a "Health-Conscious Culture" in which all employees are considerate about one another's health and actively take part in activities to promote better all-around health.
- With robust programs to support employees returning to work after taking mental health leave and employees receiving ongoing medical treatment, the Sumitomo Rubber Group strives to create workplaces where illness is not an obstacle to continuing work.
- The Sumitomo Rubber Group is working to create a culture of mutual aid while actively encouraging employees to take full advantage of childcare leave and other programs meant to support those who have special needs outside of work. At the same time, we also strive to empower employees to achieve the level of work-life balance that works best for them through various programs to accommodate diverse lifestyle and career choices, including special leave for employees who choose to accompany their spouses on overseas assignments and so forth.
- The possession and use of illegal narcotics is strictly prohibited, as is the consumption of alcohol in the workplace. The abuse of narcotics and alcohol not only endangers the abuser himself or herself, but also exposes those around him or her to danger as well. In order to provide a work environment where everyone can work in safety and peace of mind, the Sumitomo Rubber Group may test employees for narcotic or alcohol use where permitted by local laws and regulations.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

– We are required to fully abide by all rules related to safety and health while actively participating in various safety and health activities. In addition, we are also expected to complete all mandatory education and training concerning safety and health.

– With an understanding that our own safety and health are ultimately our own responsibility, we are expected to work together with coworkers in ongoing efforts to maintain safety and health in our workplaces.

Ⅰ-2 Respect for Personality & Individuality

The Sumitomo Rubber Group respects the personality, individuality and privacy of everyone who works with us. Therefore, the Sumitomo Rubber Group strives to maintain wholesome workplaces where no person is ever harassed or discriminated against for reasons relating to any ideology, faith, religion, race, ethnicity, skin color, nationality, language, social class, gender, sexual orientation, gender identify, age, mental or physical handicap, employment situation or circumstances of hiring, etc.

- The Sumitomo Rubber Group views power harassment, sexual harassment and other forms of harassment as a serious human rights issue that harms the dignity of individuals while contributing to a more hostile work environment for everyone. Thus, we aim to create wholesome workplaces where everyone can enjoy worthwhile work in safety and peace of mind. Toward this end, we are engaged in extensive efforts to foster mutual respect among our employees so that nobody in our Group will "engage in, allow, tolerate or ignore harassment in any way, shape or form."
- The Sumitomo Rubber Group takes a strict stance against power harassment, which involves abusing one's status or position to denigrate the character or harm the dignity of another person or persons. We do not engage in, allow or tolerate power harassment.
- The Sumitomo Rubber Group takes a strict stance against sexual harassment: we do not engage in, allow or tolerate sexual harassment. We strive to ensure that no employee is victimized by unwanted comments or actions of a sexual nature in the workplace. We also understand sexual harassment to include overbearing intrusions into a person's private life, which includes prying into matters of marriage and pregnancy, etc.
- The Sumitomo Rubber Group does not tolerate behaviors that create a hostile work environment, including comments or actions that hinder an employee's right to make use of company programs related to pregnancy, childbirth, childcare or family care, etc.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

– We are expected to behave in an appropriate manner at all times, based on an understanding that power harassment and sexual harassment can occur outside of the workplace and outside of working hours, such as in the course of interacting with business partners or jobseekers, etc.

– We are expected to work to understand one another and respect each other's individuality and viewpoints.We are expected to contribute to the creation of agile organizations through active teamwork that thrives on diversity as well as motivation that is shared by all.

– We are expected to be respectful of varying viewpoints and diverse attributes while acting with an awareness of our own unconscious biases so that we can create workplaces where every individual is able to harness his or her own unique abilities to their fullest.

Ⅰ Relationship Between Company & Employees

Ⅰ-3 Fair Evaluations & Compensation, Skill Development

The Sumitomo Rubber Group strives to implement and operate personnel systems that evaluate and compensate each and every employee in a way that is fair and equitable to all.

- Through our personnel systems, the Sumitomo Rubber Group actively promotes skill development for all of our employees so that each and every employee may enhance his or her own job performance while expanding and improving his or her own work.
- Through our personnel systems, the Sumitomo Rubber Group strives to create a work environment where each and every employee remains motivated to work, driven by a sense that his or her work is meaningful and worthwhile.
- With the aim of promoting employee skill development, the Sumitomo Rubber Group offers various types of training and lectures while also providing support for those who wish to participate in external training, seminars or other learning activities on their own initiative.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

– We are expected to encourage and push each other in the direction of mutual growth in order to maximize the combined strength of our team as a whole.

– We are expected to take the initiative in tackling difficult challenges and accomplishing feats that have never been done before without fear of failure.

Ⅰ-4 Protecting Corporate Assets

The Sumitomo Rubber Group shall diligently manage tangible and intangible corporate assets, utilizing these assets effectively to maximize the profits of our Group while protecting them from loss, damage, theft or misuse.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

– The use of corporate funds, devices, vehicles, equipment, supplies, software and other corporate assets is permitted only to the extent that is necessary for us to carry out our work. Therefore, we may not use corporate assets for private purposes unrelated to the company's business activities or for other purposes not explicitly approved by the company, including the use of company phones for private calls or the use of company computers for private emails.

– In order to prevent loss, damage, theft or misuse of corporate assets, we are expected to use corporate assets in a prudent manner and to handle corporate assets with due care under a robust management system that includes ledger management, proper storage (such as in safes, etc.) and management of keys, etc.

– When we retire, we must return all corporate assets and all work-related data, documents and so forth to the company. After retirement, we may not use corporate assets or data without the express permission of the company. Further, our duty of confidentiality remains in effect in perpetuity, even after our retirement.

– Upon noticing the loss or theft of any information devices on loan from the company, please promptly contact the organization within your company that is responsible for information systems.

Emergency Contact:

(Within Japan): (+81)78-265-3081 (Available 24/7 Year-Round)

(Overseas Group Companies): Please contact the organization in your company that is responsible for information systems.

Ⅰ Relationship Between Company & Employees

Ⅰ-5 Prohibition Against Conflicts of Interest

The Sumitomo Rubber Group strictly prohibits any actions that create (or may possibly create) any conflict of interest between our Group and any individual employee or executive.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

- If a conflict of interest (or the possibility thereof) should arise, we must immediately report this to our superiors or to the responsible department.
- We must not become employees or executive officers of business partners (suppliers, customers, etc.) or competitors of the Group or invest in such a company.
- We must not abuse our capacity as Group employees to engage in business dealings with companies that are owned by ourselves or our friends or family members or any other transactions that raise questions concerning fairness and impartiality.
- We must not accept excessive entertainment or gifts from business partners (suppliers, customers, etc.) even if we have no intention of providing any particular benefit or utility to said business partners in return.
- We must not use any information that we have learned in the course of our work for our own benefit or for the benefit of some other party outside of our Group.
- We must not make fraudulent applications for the reimbursement of travel costs or other expenses.
- We must not conspire with business partners (suppliers, customers, etc.) to engage in fictitious or round-trip transactions or to inflate invoices.

Ⅱ Engaging in Business Activities

Ⅱ-1 Providing Goods & Services

The Sumitomo Rubber Group considers it our top priority to provide products and services that are safe and appealing, that fulfill customer quality requirements and that comply with all applicable laws and regulations.

- Our business activities are premised on our ability to live up to the trust that our customers place in us, which means providing quality products and services while making sure that no damage to human life, health or property will come about as a result of any defect in our products.
- In order to ensure that we provide safe products and services that fulfill customer requirements while complying with all applicable laws and regulations, the Sumitomo Rubber Group carries out all product processes in accordance with the framework established by our Quality Management System (QMS), which encompasses everything from research and development to manufacturing, processing, inspections, distribution and sales.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

- Quality assurance is the very cornerstone of our business activities. At the same time, however, quality assurance is not something that is carried out by any specific employees or departments, but by all employees and all departments. It is an ongoing groupwide activity that encompasses sales, research and development, manufacturing, support departments and so on. We are expected to understand this and to act accordingly.
- In carrying out our work, we must not deviate from manuals, disregard quality control standards, falsify inspection results or otherwise act in a way that sacrifices quality for the sake of cost or expedience.
- Where we have concerns about the safety of a product due to a customer claim, accident or other product trouble, we must promptly report these concerns to our superiors and to the Quality Assurance Department.
- In the event of an accident involving one of our products, we must respond in a manner that gives top priority to customer safety. This includes providing customers with true and accurate information while taking appropriate corrective action in good faith.

Ⅱ Engaging in Business Activities

Ⅱ-2 Information Management & Protection

The Sumitomo Rubber Group considers information (including personal information) about customers and business partners obtained in the course of business dealings, technical and business information (i.e. trade secrets) in the possession of group companies as well as personal information about our employees to be an invaluable and essential asset to our Group. Recognizing that unauthorized disclosure or leaks of such information would have a negative impact on our business activities, the Sumitomo Rubber Group handles, manages and protects confidential information in an appropriate manner according to all applicable laws, regulations and corporate rules.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

- When handling trade secrets, information about customers and business partners and other confidential information in the possession of Group companies, we must exercise particular care to ensure that we do not engage in any of the following irresponsible behaviors.
  - Improperly managing or storing such information in a setting where anyone can access it freely.
  - Disclosing or leaking information not (yet) intended for public release to any other party (either inside or outside of our Group) without a legitimate reason to do so.
  - Using such information for private purposes.
  - Duplicating, revising, altering or disposing of such information without a legitimate reason to do so.
  - Disposing of information that is no longer necessary without following proper disposal procedures.
- We also need to be careful when it comes to the security of devices used to store and handle information, as well as conversations in public spaces.
- By law, information about Group employees is also considered to be personal information and is therefore treated as equivalent to the personal information of customers or other outside parties. As such, we must not handle personal information in an inappropriate manner even when the personal information in question concerns our own employees.
- When we retire, we must return to the company any and all documents or recording media, etc. in our care containing any secret information. Further, our duty of confidentiality remains in effect in perpetuity, even after our retirement.
- Anyone who has illegitimately obtained or disclosed secret information may be subject legal consequences, including penalties, fines and/or imprisonment.

Ⅱ-3 Fair Competition

The Sumitomo Rubber Group shall fully abide by all laws, regulations and rules concerning fair competitive practices that apply not only in Japan, but in each country and region of the world in which we operate.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

- We must not collude with other companies in our industry or enter into unlawful arrangements (such as cartels, price fixing, etc.) for the purpose of unfairly influencing product pricing, market shares or sales territories or otherwise impeding the free and open business activities of any entity.
- We must not dictate product (retail) sales prices or attempt to coerce customers or business partners to maintain product (retail) sales prices at a certain level (i.e. resale price maintenance).
- We must not engage in price setting that discriminates against specific customers or business partners or attempt to shut out competitors through underselling (dumping) or refusal to do business with specific parties, etc.
- We must not make false or misleading representations in product displays, catalogs or advertisements (including online advertisements) or engage in false advertising that may potentially mislead customers about products or services or otherwise engage in any activity that violates the Act against Unjustifiable Premiums and Misleading Representations.
- When providing products and services, we must not substitute or conflate these with the products or services of another party, imitate the appearance or labeling of other products, make misleading representations concerning product quality, etc. or otherwise engage in any activity that violates the Unfair Competition Prevention Act.

Ⅱ Engaging in Business Activities

Ⅱ-4 Dealings with Contractors & Suppliers

The Sumitomo Rubber Group shall fully abide by all laws, regulations and rules concerning procurement practices that apply not only in Japan, but in each country and region of the world in which we operate. At the same time, we shall always strive to ensure that our business dealings with suppliers and contractors are fair and aboveboard. Further, through our procurement activities, we shall also work together with suppliers and contractors in ongoing efforts to fulfill our corporate social responsibilities.
In addition, the Sumitomo Rubber Group shall actively select suppliers and contractors who demonstrate superior safety, quality, pricing, delivery and supply stability, who fully abide by all applicable laws, regulations and social norms and who give due consideration to human rights, labor rights, safety, health and the environment.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

- We must engage in business dealings with suppliers and contractors on an equal footing and must not attempt to force unfair trade terms, demand unfair discounts or unreasonably restrict business dealings between a contractor/supplier and any third party, etc.
- We must not unjustly reduce or delay payments to contractors or suppliers or make unreasonable demands for price cuts, etc.
- We must not take advantage of our position to extract some personal benefit or utility from contractors or suppliers.
- We must verify that suppliers and contractors take sufficient consideration when it comes to preventing human rights abuses, human trafficking, child labor, forced labor, the use of conflict minerals, environmental destruction, corruption and so forth.
- When selecting contractors or suppliers, we must do so based on fair and equitable criteria while disregarding any particular personal connections or prejudices.

Ⅱ-5 Protection of Intellectual Property

Considering intellectual property to be an important asset for our business, the Sumitomo Rubber Group encourages and promotes the creation of new intellectual property while striving to appropriately protect and effectively utilize existing intellectual property. Further, we shall not in any way infringe upon the intellectual property rights of any other entity.

- In the event of infringement of the intellectual property rights of the Sumitomo Rubber Group by some outside party, we shall act to protect our intellectual property by asserting our intellectual property rights according to the procedures prescribed by law and in a manner that is consistent with fair practices and accepted social norms.
- The Sumitomo Rubber Group shall provide appropriate compensation to employees who have created new intellectual property in the course of their work upon acquiring the rights to said intellectual property. Please notify the company of any new intellectual property that has been created in the course of your work without delay while being mindful of your duty of confidentiality.
- Employees of Sumitomo Rubber Group companies are entitled to the following types of compensation as consideration for inventions or other new intellectual property that they have created in the course of their work.
  (1) Application Compensation (3) Performance Compensation
  (2) Registration Compensation (4) Knowhow Compensation

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

- We are expected to respect the intellectual property (and inherent right to benefit from said intellectual property) of other parties arising out of their inventions, writings or designs, etc. As such, we must not manufacture, sell, import or export any product that imitates the design of another party's product or that uses product labeling that is identical or similar to the labeling that another party already uses on products or other business materials. Further, we must not otherwise infringe upon the intellectual property rights of any other party or engage in any unfair competitive practices.
- We must not employ illegitimate means to obtain from another party any trade secrets or other valuable data that can be utilized to enhance the value of products or services (i.e. limited disclosure data).
- We must exercise sufficient caution to ensure that the trade secrets and limited disclosure data of other parties has not been obtained through illegitimate means or unauthorized disclosure. We must not obtain, use or disclose any information that has been obtained through illegitimate means or unauthorized disclosure, regardless of whether directly or indirectly.
- Where the trade secrets of another party have been legitimately obtained based on the terms of a contract, said trade secrets must be used in accordance with the provisions of said contract and managed in an appropriate manner to prevent unauthorized use or disclosure to outside parties.

Ⅱ Engaging in Business Activities

Ⅱ-6 Export Controls

In the interests of maintaining the peace and security of the international community, the Sumitomo Rubber Group shall practice strict export controls in accordance with various laws, regulations and treaties concerning international trade.

※When exporting products or sharing or licensing technologies that could potentially be used in the development or manufacture of nuclear materials, nuclear weapons, chemical weapons or other weapons of mass destruction, etc. to foreign entities, it is first necessary to obtain the permission of the competent authorities by following the procedures prescribed by various laws, regulations and treaties concerning international trade.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

- While the Sumitomo Rubber Group does not currently (as of July 2022) produce any products or technologies that could directly be used in the development or manufacture of nuclear weapons or other weapons of mass destruction, it is still necessary to apply to the competent authorities for export authorization where required by applicable laws or regulations.
- When exporting equipment or machinery that is not a product of the Sumitomo Rubber Group, please be sure to obtain documentation from the manufacturer or supplier attesting to the fact that the equipment or machinery in question is not subject to export controls. Having done so, please then check with the competent authorities as to whether export authorization is necessary nevertheless. (Particular caution is needed here, as even individual components of a piece of equipment or machinery may be subject to export controls.)
- Please also exercise caution with regard to exports originating outside of Japan, as the same controls that apply to exports from Japan also apply to exports between companies of the Sumitomo Rubber Group outside of Japan.
- Failure to fully abide by laws and regulations concerning import and export controls may result in serious legal consequences, including steep fines and/or imprisonment, etc. As import and export controls vary from country to country and are frequently revised, please be sure to contact the Legal Affairs Department should you have any questions or uncertainties concerning exports.

※ About OFAC Controls

In order to accomplish objectives with respect to foreign policy and national security, the United States imposes and enforces sanctions (including prohibitions against transactions and the freezing of assets) against designated persons and organizations, such as government agencies and state-owned corporations in countries that are subject to UN sanctions or US embargoes, state sponsors of terrorism and so forth. Any transaction that is denominated in US dollars, regardless of where in the world it takes place, is potentially subject to these sanctions, which are known as OFAC Controls. Where a business partner (supplier, customer, etc.) is subject to OFAC Controls (or where there is a strong suspicion that a business partner may be subject to OFAC Controls), transactions with said business partner may be impeded, as payment processing may not proceed smoothly, and payments may even be frozen as the assets of a sanctioned individual or organization. The United States Treasury Department publishes a list of persons and organizations who are subject to OFAC Controls, called the SDN List (Specially Designated Nationals and Blocked Persons List). Thus, it is important to check the SDN List prior to engaging in transactions with business partners (and especially new business partners) who may potentially be subject to OFAC Controls.

Ⅱ-7 Restrictions on Entertaining, Gifts, Donations, Etc.

The Sumitomo Rubber Group shall not engage in any actions or behaviors that go beyond the realm of generally accepted business practices when it comes to entertaining, gifts, donations or the provision of other forms of benefit or utility.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

- When providing entertainment or gifts, etc. to customers or making donations, we must first complete the requisite internal procedures as dictated by the company and must not exceed the realm of generally accepted business practices.
- We must not accept from suppliers any expensive gifts, excessive entertainment or other forms of benefit or utility beyond the realm of generally accepted business practices. Please be sure to consult with your superiors if you have been offered excessive entertainment or expensive gifts.

Ⅱ Engaging in Business Activities

Ⅱ-8 Relations with Public Officials

The Sumitomo Rubber Group strictly prohibits the provision of entertainment and gifts to public servants in Japan and overseas (including those whose work descriptions and responsibilities make them de facto public servants).

- The Sumitomo Rubber Group prohibits small-sum facilitation payments except where these are explicitly permitted in accordance with the laws or regulations of the country or region in which they occur.

※ Facilitation payments are small-sum payments intended to facilitate or expedite the procedures entailed in the provision of certain administrative services.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

– We must not provide illicit benefit, utility, entertainment or gifts, etc. to employees or former employees of government agencies, local public entities or other public institutions, regardless of whether in Japan or overseas.

– Notwithstanding the above, please prioritize personal safety in cases where refusal to follow the demands of a public servant may potentially result in bodily harm or loss of life.

– It is also against the law to provide illicit benefit, utility, entertainment or gifts to public servants through the offices of a consultant, agent or other intermediary. Further, even in cases where a consultant, etc. has used payments received from the company to fund the provision of illicit benefit, utility, entertainment or gifts to public servants at his or her sole discretion, any employees involved with said consultant, etc. still run the risk of being charged and punished as accomplices.

Thus, it is particularly necessary to pay attention to the following points.

・Is the consultant, etc. demanding payment of excessive consulting fees?

・Are the actual contents of services to be provided clearly stated in a contract?

・Does the consultant, etc. have any relatives or close friends who are public servants?

– Where a public servant has demanded a bribe or some other form of illicit benefit, please promptly report the situation to your superiors or the Corporate Ethics Helpline (Compliance Consultation Office).

Ⅱ-9 Timely Disclosure of Information

In the interests of ensuring corporate accountability with respect to our shareholders, investors and other stakeholders, the Sumitomo Rubber Group shall provide reliable, accurate and transparent information concerning the material facts of our management philosophy, business policies, financial situation, business activities and other general corporate activities to securities exchanges in a timely manner. Further, we shall respond to outside inquiries concerning the information that we have disclosed in a manner that is prompt and appropriate while complying with the applicable regulations enacted pursuant to the Financial Instruments and Exchange Act (including Fair Disclosure Regulations and Insider Trading Regulations).

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

– With the exception of information for which we are bound by a duty of confidentiality or information that is generally considered to fall under the category of trade secrets, we shall generally disclose accurate and timely information concerning our corporate management and business activities in line with the contents of our consolidated financial statements.

– We shall respond to external requests for the disclosure of information in good faith, handling inquiries and press relations based on the following lines of thinking.

・Do not refuse such requests without a valid reason to do so.

・Do not say anything that contradicts the facts.

・Clearly state that you are unable to disclose certain information if this is the case.

・Do not disclose different information or respond differently to different individuals.

– Please notify the Public Relations Department of any external inquiries or requests from journalists.

Ⅱ Engaging in Business Activities

Ⅱ-10 Prohibition Against Insider Trading

The Sumitomo Rubber Group strictly prohibits actions that impinge upon the fairness of securities markets through the misuse of insider information (about either Group companies or other companies) that we have learned in the course of our work.

※ The term "insider information" refers to important corporate information that has not (yet) been disclosed to the public and that would influence the investment decisions of investors if known, such as information concerning products, finances, capital flow, business partnerships and so forth.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

- We must not disclose any insider information that we have learned in the course of our work to any party (regardless of whether inside or outside of our Group) until said information is made available to the public.
- We must not engage in insider trading after learning insider information about either Group companies or other companies in the course of our work. This means that we must refrain from buying or selling stocks or other securities in the companies in question until said information is made available to the public. This rule also applies to securities trades carried out by our family members, relatives and friends. Please understand that insider trading and the illicit sharing of insider information is against the law (in Japan, insider information and insider trading are subject to the Financial Instruments and Exchange Act). Violations are subject to legal consequences, including surcharges, fines and/or imprisonment.
- Those working in sections or departments that handle insider information must exercise sufficient caution in the handling of said information so that unauthorized personnel do not have access to insider information.

Ⅲ Relationship Between Company & Society

Ⅲ-1 Abiding by Laws & Social Norms

The Sumitomo Rubber Group shall uphold and fully abide by all applicable laws, regulations and social norms.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

- As we go about our day-to-day work, we should always keep in mind the fact that the continuation of our business activities is premised on our compliance with all applicable laws, regulations and social norms.
- We should listen to criticism or other opinions from society at large with humility and respond in an appropriate manner, such as by working in good faith to make improvements.
- As we are directly involved in the automotive industry, we bear a particular responsibility to obey traffic rules, to drive in a manner that sets an example for others and to actively promote traffic safety in general.
- We shall obey the tax laws in each country and region of the world in which we operate as well as international tax rules, both in letter and in spirit. As such, we shall pay the taxes that we owe when they are due.

Ⅲ Relationship Between Company & Society

Ⅲ-2 Dealing with Antisocial Forces

The Sumitomo Rubber Group takes a strict stance against organized crime and other antisocial forces, staunchly refusing all business dealings and other relations with antisocial forces. Further, we do not in any way, shape or form fund, employ or allow ourselves to be intimidated by antisocial forces.

※ "Antisocial forces" is a blanket term for organizations and individuals who employ violence, threats and various fraudulent means to pursue illicit financial gain. Antisocial forces include gangs, front companies associated with gangs, extortionists who disrupt (or threaten to disrupt) general meetings of shareholders, racketeers who operate under the guise of social or political activism, organized crime syndicates and so forth.

- The Sumitomo Rubber Group takes an organizational approach to dealing with antisocial forces. Our basic stance is to present a united front in responding to any and all demands from antisocial forces by staunchly refusing to cooperate with any such demands, contacting the police at the first sign of potential trouble and fully cooperating with police thereafter. Upon receiving a report of demands or any other contact from antisocial forces, we shall work to ensure the safety of our employees through a comprehensive organizational response that involves close cooperation and coordination with police, attorneys, specialized agencies and other experts both inside and outside of our Group.
- As a general rule, the Sumitomo Rubber Group includes a standard clause concerning the elimination of antisocial forces in all contracts that we conclude so that we may immediately cease transactions and terminate contracts with business partners (suppliers, customers, etc.) who are found to have any form of involvement with antisocial forces.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

– We are required to promptly report any contact that we have with antisocial forces to our superiors, who are then required to contact the Legal Affairs Department or the Human Resources & General Affairs Department.

– We need to pay particular attention to the following points in order to ensure that we do not become involved in money laundering.
  - Business partners who insist on payments in cash or cash equivalents.
  - Payments from third parties who have no involvement in the business dealings in question or from bank accounts that are not usually used in the course of normal business dealings.
  - Business partners who demand that payments be divided into multiple small-sum payments.
  - Business partners who are hesitant to provide information or who provide inaccurate information.
  - Business partners who are listed on the SDN List or other similar lists.

※ Money laundering is the process of obscuring the origin (source) of illicit gains from drug deals, tax evasion, fraudulent accounting or other criminal activity by means of using multiple anonymous bank accounts and/or bank accounts under false names to shuffle illicit funds between several financial institutions or by repeatedly trading financial instruments, etc.

※ Issued by the US Treasury Department, the SDN List (Specially Designated Nationals and Blocked Persons List) is a list of sanctioned individuals and organizations, such as government agencies and state-owned corporations in countries that are subject to UN sanctions or US embargoes, state sponsors of terrorism and so forth.

Ⅲ-3 Involvement in Politics

The Sumitomo Rubber Group shall fully abide by all applicable laws, regulations and rules concerning the political activities of corporations.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

– Except where explicitly permitted by applicable laws and regulations, we must not make political donations or participate in political campaigns for politicians or political organizations who have some direct connection with our business activities.

– If requested to participate in a political campaign on the corporate level (i.e. as a corporate representative), please contact the Human Resources & General Affairs Department and respond according to the instructions that they provide.

Ⅲ Relationship Between Company & Society

Ⅲ-4 Sustainability Efforts

Based on our Basic Philosophy for Sustainability Activities, the Sumitomo Rubber Group aims to be a corporate group that earns the trust of society at large through business activities that actively contribute to the solution of various social issues in order to move toward the realization of a sustainable society.

- The globalization of our business has led to the diversification of our stakeholders, who are now spread out across the world. In order to earn the trust of all of our many stakeholders, it is essential that we always strive to engage in business activities that are honest and aboveboard.
- In addition to abiding by all applicable laws and regulations, the Sumitomo Rubber Group also strives to minimize the environmental impact of our products, services and overall business activities as much as possible.
- In the interests of improving the sustainability of our business activities, the Sumitomo Rubber Group shall work to promote environmental activities that account for biodiversity, uphold human rights, create a wholesome work environment, prioritize safety and health, augment our corporate governance and so forth.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

– We should all actively engage in various activities as upstanding members of our local communities so that communities will come to welcome and trust the Sumitomo Rubber Group.

Ⅲ-5 Abiding by Local Rules in Each Country

With an awareness of our position as a member of the international community, the Sumitomo Rubber Group and our employees shall ensure that we properly understand and fully abide by the rules of each country and region in which we operate.

As employees of the Sumitomo Rubber Group, we are expected to practice the following.

– Social values can vary greatly between countries and regions. As such, it is essential that we not only have a sufficient understanding of local laws and social conditions, but also engage in business activities that give ample consideration to local cultures, customs, religious beliefs and so forth.

– In the interests of fostering greater mutual understanding, the Sumitomo Rubber Group encourages and supports cultural and social activities undertaken by our overseas subsidiaries and the employees thereof while actively promoting closer communication among our employees throughout the world.

– We must not provide any illicit benefit, utility, entertainment or gifts to public servants in foreign countries, regardless of local customs.

※ Legal Extraterritoriality

In some cases, the laws and regulations of one's own country may apply to actions carried out overseas or business dealings involving corporations that operate in foreign countries. For example, when US authorities discovered that another company in our industry had engaged in bribery in various countries throughout Latin America, they imposed hefty fines against that company, even though the bribery had taken place overseas (because the company also operated in the United States).
As extraterritorial laws are especially likely to apply in cases involving fair competition, corruption, security trade controls and money laundering, employees of the Sumitomo Rubber Group must exercise particular caution not only when it comes to following local laws, but also to avoid potential violations of extraterritorial laws.

Should you have any questions about the contents of this Code of Conduct as they relate to your actual work, please consult with your superiors, the Legal Affairs Department, the Human Resources & General Affairs Department, the Intellectual Property Department or other related departments before engaging in any action about which you are unsure.