

2024 Report based on  
Canada's "Fighting against Forced Labour and Child Labour in the Supply Chain Act"

Sumitomo Metal Mining Co., Ltd.  
SMM Gold Cote Inc.

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## 1. Introduction

This report has been jointly prepared and published by Sumitomo Metal Mining Co., Ltd. (hereinafter referred to as "the Company") and SMM Gold Cote Inc. (hereinafter referred to as "SMMGC") based on the "Act on the Prevention of Forced Labour and Child Labour in Supply Chains, etc." in Canada (hereinafter referred to as "the Act"). This report outlines the initiatives undertaken by the Company and SMMGC during the fiscal year 2024 (from April 1, 2024, to March 31, 2025, for the Company, and from January 1, 2024, to December 31, 2024, for SMMGC) with the aim of preventing forced labour and child labour in their business operations and supply chains.

## 2. Structure, Business Activities, and Supply Chains

### (1) Structure

#### 1. Sumitomo Metal Mining Co., Ltd.

The Company is a Japanese corporation headquartered in Tokyo and listed on the Tokyo Stock Exchange.

The Company engages in mining development both domestically and internationally, smelting a diverse range of non-ferrous metals including nickel, copper, and gold, and producing battery and functional materials. For more information about the Company and its business activities, please visit the following website at <https://www.smm.co.jp/en/>

#### 2. SMM Gold Cote Inc. (SMMGC)

SMMGC is a wholly owned subsidiary of the Company, established under the laws of the Province of British Columbia, Canada, and headquartered in Vancouver, British Columbia. As of December 31, 2024, SMMGC employed ten employees.

### (2) Business Activities

The Company is a global enterprise with a unique business model that integrates three core businesses: the mineral resource business, which involves environmentally and socially responsible mining development and operation; the smelting and refining business, which produces high-quality metal materials from mined mineral resources; and the materials business, which produces high-value-added functional materials. The Company focuses on the production of nickel, copper, and gold. The Company holds interests in world-class copper mines worldwide and operates the only large-scale commercial gold mine in Japan.

SMMGC engages in mining operations and related ancillary activities at the Côté Gold Mine, a joint venture development project between the Company and IAMGOLD Corporation (hereinafter referred to as "IMG"), which is headquartered in Toronto, Canada. The Côté Gold Mine commenced commercial production in August 2024.

### (3) Supply Chains

The Company group has established a traceability system for consistent raw material procurement, stable supply, and quality, within the group, through the collaboration of its three businesses: "Resources," "Smelting and Refining," and "Materials."

For more details on the Company's business activities and supply chains, please refer to the following website.

Integrated Report 2024

[https://www.smm.co.jp/en/ir/library/integrated\\_report/pdf/2024/2024\\_All\\_EN.pdf?241224](https://www.smm.co.jp/en/ir/library/integrated_report/pdf/2024/2024_All_EN.pdf?241224)

SMMGC engages in the development of the Côté Gold Mine, in which the Company holds interests jointly with IMG. The mining operations are conducted by IMG.

## 3. Fundamental Approach to Forced Labour and Child Labour

Given that the resource industry often involves large-scale development in its operational areas, it has a significant impact on local communities. Additionally, especially in mineral resource development, there are risks of human rights violations, such as child labour. Considering these business characteristics, the SMM Group<sup>1</sup> places a strong emphasis on respecting the human rights of "local residents and indigenous peoples," "employees in the supply chain," and "employees of the SMM Group" among its stakeholders.

The SMM Group supports the United Nations "Guiding Principles on Business and Human Rights" and upholds "respect for human beings" as a fundamental principle in its management philosophy. Based on the SMM Group's "Policy on Human Rights," we promote human rights initiatives, including the implementation of due diligence and the operation of grievance mechanisms.

### (1) Sumitomo Metal Mining Group Policy on Human Rights

In 2025, the Company revised its group policy on human rights. This policy sets forth

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<sup>1</sup> Sumitomo Metal Mining Co., Ltd. and its subsidiaries

commitments to fundamental human rights issues, including respect for children's rights and the prohibition of child labour, and a zero-tolerance stance on discrimination, harassment, and bullying based on race, religion, gender, age, sexual orientation, disability, nationality, etc. The Company also commits to respecting human rights based on international norms such as the International Bill of Human Rights and the ILO Core Labour Standards (10 conventions in 5 areas: effective recognition of the right to collective bargaining, elimination of all forms of forced labour, effective abolition of child labour, elimination of discrimination in respect of employment and occupation, and safe and healthy working conditions). In the event of a conflict between applicable laws and regulations in the Company's operational areas and international human rights norms, the Company will seek ways to respect international norms while complying with the laws and regulations.

Sumitomo Metal Mining Group Human Rights Policy

[https://www.smm.co.jp/en/sustainability/management/humanrights\\_procurement/](https://www.smm.co.jp/en/sustainability/management/humanrights_procurement/)

## (2) Mineral Procurement Policy

Based on the Sumitomo Metal Mining Group Policy on Human Rights, the SMM Group does not procure minerals that may be associated with human rights violations such as child labour and forced labour, environmental destruction, illegal mining, corruption, or minerals that could potentially fund armed groups.

We respect the guidance set forth by the Organisation for Economic Co-operation and Development (OECD) regarding mineral procurement and appropriately engage with suppliers to ensure responsible mineral procurement throughout the supply chains. For related policies, please refer to the following links:

Sumitomo Metal Mining Group Policy on Responsible Mineral Procurement

<https://www.smm.co.jp/en/sustainability/management/procurement/>

Policy on Conflict Minerals in Gold and Silver Smelting

<https://www.smm.co.jp/en/sustainability/management/pdf/ConflictMaterial.pdf>

Policy on Responsible Sourcing of Copper, Nickel, and Cobalt Materials

[https://www.smm.co.jp/en/sustainability/management/pdf/responsible\\_sourcing\\_policy.pdf](https://www.smm.co.jp/en/sustainability/management/pdf/responsible_sourcing_policy.pdf)

## (3) SMM Group Code of Conduct

The Company group has established the "SMM Group Code of Conduct" to realize its management philosophy of contributing to society and fulfilling its responsibilities

to stakeholders through sound corporate activities, aiming to become a more trusted company. The Code of Conduct sets forth specific behavioral standards for officers and employees, indicating that compliance is fundamental to corporate activities.

SMM Group Code of Conduct

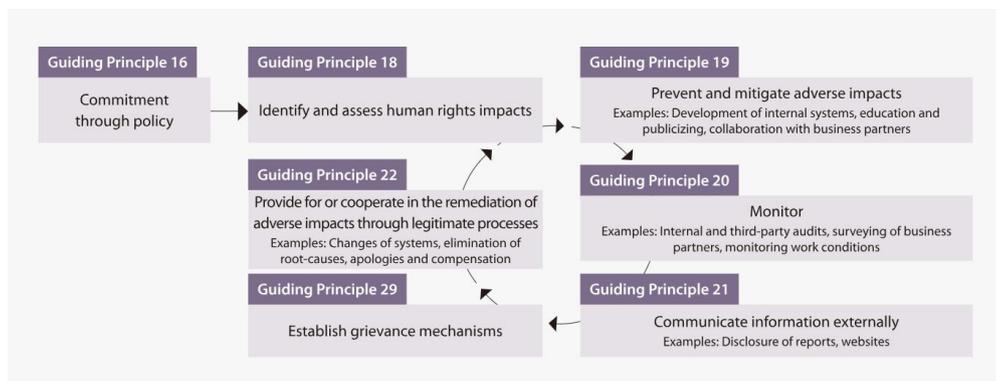
<https://www.smm.co.jp/en/sustainability/management/compliance/>

#### 4. Due Diligence Process for Forced Labour or Child Labour

The SMM Group engages in human rights due diligence in accordance with the "OECD Due Diligence Guidance for Responsible Business Conduct," among others. We recognize the raw material procurement supply chain within the Company's business operations as a high-risk supply chain. To address these high risks, we conduct due diligence and risk assessments on the raw material procurement supply chain.

##### (1) Process for Initiatives on Business and Human Rights

Based on the United Nations Guiding Principles, we have organized our initiatives on business and human rights as shown in the diagram below. The Company engages in due diligence and operates grievance mechanisms based on its human rights policy and discloses the details of these efforts in Sustainability Reports and other publications.



##### (2) Due Diligence Based on the Policy on Conflict Minerals in Gold and Silver Smelting

We conduct due diligence on our gold and silver raw material suppliers and evaluate the associated risks. If the evaluation reveals that the materials are conflict minerals originating from conflict-affected areas, we cease transactions with those suppliers.

As part of transaction monitoring, the smelter performs physical inspections and weight measurements of the gold and silver raw materials delivered to the smelter,

verifying the consistency with the transaction information recognized by the procurement department. Additionally, to ensure that due diligence on gold and silver raw material suppliers is properly conducted, we carry out regular internal audits. We also undergo audits by independent third-party organizations for gold and silver raw materials involved in gold and silver smelting.

### (3) Due Diligence Based on the Policy on Responsible Sourcing of Copper, Nickel, and Cobalt Materials

We conduct due diligence on the supply chains of copper, nickel, and cobalt raw materials and evaluate the associated risks. For high-risk supply chains, we perform additional investigations before deciding whether to proceed with transactions.

If it is found that upstream suppliers engage in serious human rights violations or provide direct or indirect support to non-state armed groups, we immediately cease transactions with them. For other risks, we work to mitigate the risks, and if it is determined that we cannot mitigate the risks, we immediately cease transactions.

As part of transaction monitoring, the smelter performs physical inspections and weight measurements of the aforementioned raw materials delivered to the smelter, verifying the consistency with the transaction information recognized by the procurement department. Additionally, to ensure that due diligence on the supply chains of the aforementioned raw materials is properly conducted, we conduct regular internal audits and undergo audits by independent third-party organizations.

## 5. Risks of Forced Labour and Child Labour in Business Activities and Supply Chains, and Measures Taken to Evaluate and Manage These Risks

### (1) Risks of Forced Labour and Child Labour in Business Activities

The SMM Group recognizes the raw material procurement supply chain within its business operations as a high-risk supply chain. To address these high risks, we conduct due diligence and risk assessments in accordance with the previously mentioned mineral procurement policies.

### (2) Measures Taken to Evaluate and Manage Risks

The SMM Group conducts supply chain due diligence in accordance with the mineral procurement policies described in section 3 article (2).

During the evaluation period from April 1, 2024, to March 31, 2025, no high-risk supply chains were identified in the relevant supply chains for each raw material.

### (3) Grievance Mechanism

The SMM Group has established an internal reporting system for its employees in relation to the grievance mechanism. Additionally, for external stakeholders, we utilize a platform operated by a third party. This platform is provided by the Japan Center for Engagement and Remedy on Business and Human Rights (JaCER), a general incorporated association established in 2022, of which the Company is one of the original members as a regular member. JaCER offers the "Engagement and Remedy Platform," a non-judicial grievance mechanism in accordance with the United Nations Guiding Principles. It also has an advisory board and stakeholder panel consisting of external experts and, when necessary, provides an advisory and mediation committee or an investigation committee composed of independent specialists to support and promote the grievance handling of member companies from a professional standpoint.

## 6. Measures Taken to Remediate the Loss of Income to the Most Vulnerable Families that Results from Any Measure Taken to Eliminate the Use of Forced Labour or Child Labour in its Activities and Supply Chains

During the aforementioned fiscal years, no instances of forced labour or child labour were identified within the SMM Group's business activities and supply chains. Additionally, it was confirmed that no income reduction of the most vulnerable households occurred due to our initiatives during the aforementioned fiscal years.

## 7. Training

The Company conducts planned and continuous education and training on supply chain due diligence for all employees involved in the supply chain due diligence of each raw material.

Additionally, through sustainability training for all employees of the SMM Group, we promote understanding of human rights and engage in in-house awareness activities, designating every December as Human Rights Month.

## 8. Assessment of Effectiveness

The SMM Group monitors transactions based on the mineral procurement policies. To ensure that due diligence on raw material supply chains is properly conducted, we conduct regular internal audits and undergo audits by independent third-party

organizations.

## 9. Approval and Attestation

This report has been approved by the Board of Directors of Sumitomo Metal Mining Co., Ltd. and SMM Gold Cote Inc.

In accordance with the requirements of Canada's "Fighting against Forced Labour and Child Labour in Supply Chains Act," particularly Article 11, I certify that I have reviewed the information contained in the report of the companies as stated above.

To the best of my knowledge and after exercising reasonable diligence, I certify that the information in the report is true, accurate, and complete in all material respects for the reporting year stated in the report, considering the purposes of the Act.

May.22.2025



Nobuhiro Matsumoto  
Sumitomo Metal Mining Co., Ltd.  
President and Representative Director

May.22.2025



Shinya Takemoto  
SMM Gold Cote Inc.  
President and Director