

Dunlop International Europe Limited

Modern Slavery Act Transparency Statement for the Fiscal Year 2025

Dunlop International Europe Limited (DIEL) is committed to improving its practices to combat modern slavery and human trafficking. This statement has been published in accordance with [the UK Modern Slavery Act 2015](#) and constitutes DIEL's modern slavery and human trafficking statement for the fiscal year 2025 ended 31 December 2025.

The statement was approved by the board of directors (or equivalent managing body) of DIEL prior to its publication.

Background and organisational structure

DIEL consists of the Dunlop brand, comprising trademarks and intangible assets necessary for the marketing, sale, and distribution of Dunlop-branded products in Europe. With our European headquarters located in Eindhoven we have branch offices based in Germany, Italy, Spain, and United Kingdom. We also have business line companies located in many areas of Europe. As a subsidiary of Sumitomo Corporation (SC) incorporated in Japan, we have access to a global network across over 60 countries.

DIEL is an integrated corporation committed to business activities in the sports industry with 5 offices in Europe in 5 countries and a network of 3 group companies worldwide which consist of the Dunlop brand. With its global network and based on trust from companies in sports industries and from consumers, DIEL engages in business activities by making the most of its integrated corporate strength. These business activities include sales and marketing of sports products and services within Europe.

Steps taken to ensure that modern slavery and human trafficking

are not taking place in DIEL's business and supply chains

DIEL, as a subsidiary of SC corporation, shares [Sumitomo's Business Philosophy](#), which has been passed down and followed faithfully for more than 400 years since Masatomo Sumitomo (1585- 1652) founded the Sumitomo family business. [SC Group's Corporate Mission Statement \(Management Principles and Activity Guidelines\)](#) is based on this philosophy and represents SC Group's fundamental and ultimate value standard. In the Corporate Mission Statement, it clearly states that the SC Group respects the personality of each individual and places prime importance on integrity and sound management.

Furthermore, to achieve sustainable growth through resolving social issues, we have set "respect human rights" as one of the "[Material Issues](#)" as an important social issue that SC Group must address and advance its medium- to long-term commitment toward resolving. We will continue to promote these efforts and disclose our progress.

The company takes its commitment to tackling modern slavery including forced labour, child labour and human trafficking very seriously. The following are the steps which we have taken to help ensure that modern slavery, including forced labour, child labour and human trafficking are not taking place in our business or supply chains:

[The SC Group's Human Rights Policy](#)

We respect "[the International Bill of Human Rights](#)" and [the International Labor Organisation's \(ILO\) "Declaration on Fundamental Principles and Rights at Work"](#), and we operate in accordance with "[the United Nations \(UN\) Guiding Principles on Business and Human Rights](#)".

We, as a subsidiary of the SC Group, in line with [the SC Group's Human Rights Policy](#), i) strive to identify and to prevent or mitigate any adverse impact on human rights through the implementation of human rights due diligence processes; ii) where we identify that our group's practices

have caused or contributed to an adverse impact on human rights, we will endeavor to take appropriate remedial measures, and iii) we will seek to improve and progress human rights measures through engagement and dialogue with relevant stakeholders.

Human Rights Due Diligence

SC's human rights due diligence is conducted through a process in accordance with international guidelines including [the UN Guiding Principles on Business and Human Rights](#), [the UN Guiding Principles Reporting Framework](#), and [OECD Due Diligence Guidance for Responsible Business Conduct](#). As a first step in fiscal year 2020, SC identified eight salient human rights issues that should be addressed with priority so that SC can assess the impact concerning human rights throughout SC Group's activities, by a desktop survey, interviews of experts on business and human rights and internal interviews.

The above identified eight salient human rights issues as follows:

- (1) labour conditions (wages and working hours);
- (2) freedom of association and the right to collective bargaining;
- (3) forced labour and child labour;
- (4) occupational health and safety;
- (5) health and safety of local residents;
- (6) land rights;
- (7) discrimination and harassment; and
- (8) personal information and privacy.

We, as a subsidiary of the SC Group, believe that the human rights of workers throughout the supply chain including our employees are essential as the foundations of business. In addition to the freedom of association and collective bargaining rights, forced labour and child labour, discrimination and harassment, and occupational health and safety, which are related to [the five core labour standards of the ILO](#), we also take action to address labour conditions. We engage in business with strong ties in local communities, and we have a responsibility to protect the health and safety of local residents and

land rights.

For each of these issues, we will investigate and carry out action plans to prevent and mitigate specific risks with priority on areas of high risk in our business.

SC identified specific businesses or groups of businesses referred to as Strategic Business Units (SBUs) that should be prioritised for risk mitigation. SC considered and implemented measures to prevent or mitigate the identified human rights risks in connection with the SBUs. SC will identify and assess human rights risks in other business units as well as implement measures to prevent or mitigate the human rights risks in each SBU.

The SC Group's CSR Action Guidelines for Supply Chain Management

SC has established [the SC Group CSR Action Guidelines for Supply Chain Management](#) and we act in accordance with it. Through the implementation of these guidelines, we are aiming to realise a sustainable society by working together with our suppliers, business partners and contractors, etc. to achieve responsible value chain management. As part of these guidelines, SC sets out the SC Group's values with regards to "Respect for human rights and not to be complicit in human rights abuses" and to "Prevent forced labour, child labour and the payment of unfairly low wages." These principles establish the overarching guidelines encompassing our commitment to combating modern slavery and human trafficking.

In the event that we find violations of these guidelines in our supply chains, we will urge suppliers, business partners or contractors, etc. to remedy and improve the situation, while providing support to them as needed. The company also acts in line with [the SC Group Forest Management Policy](#) and [the SC Group Sourcing Policy for Forest Products](#) as specific policies for natural resource-related commodities requiring sustainable procurement. The policies include our commitment to respect human rights by operating forest related

businesses in accordance with [SC Group's Human Rights Policy](#) as well as [the UN Guiding Principles on Business and Human Rights](#).

Training

In order to raise our awareness especially about modern slavery, SC utilises an American NGO Verite's free e-Learning of Supply Chain Accountability on forced labour as a useful training material, which is one of the referred tools on '[Transparency in Supply Chains: A Practical guide](#)' published by UK Home Office.

Active commitment to the UN Global Compact

SC Group signed [the UN Global Compact](#) and declared its support for the 10 principles in March 2009. This international sustainability related initiative shares the same values as SC Group's Corporate Mission Statement. With SC Group's participation in the Global Compact, we have committed ourselves to further increasing corporate value by constantly seeking out areas of our business activities that can be improved in light of the values advocated by the 10 principles. The UN Global Compact has been referred also through the internal auditing process of SC Group.

The company believes that eradication of modern slavery is important, and we will continue to undertake these efforts aimed at ensuring that no modern slavery or human trafficking of any form exists in our business and supply chains.

December 31, 2024

Signed by:



Frans Swinkels
Managing Director

Dunlop International Europe Limited

In accordance with Section 54 of the United Kingdom's Modern Slavery Act 2015, this DIEL Modern Slavery Act Statement 2025 covers and has been approved by the board of directors (or equivalent managing body) of the following entities:

- Dunlop International Europe Limited