

Assessment of Company Expectations 2025/26

Company adherence to the Expectations for EITI supporting companies

Company name	Sumitomo Metal Mining
Sector	Mining
Headquarters	Tokyo, Japan
Type	Publicly listed
Date of submission to company (month/year)	January 2026
PREAMBLE MSG Participation	<i>Pursuant to the Guidance on the Expectations for EITI supporting companies, companies are encouraged to participate in national EITI multi-stakeholder groups (MSGs). This data is collected for information purposes.</i>
Does the company participate in a multi-stakeholder group?	Yes
If yes, indicate in which countries the company is participating in MSGs?	PERU
Secretariat comment on MSG participation	<p>The Secretariat notes Sumitomo Metal Mining's engagement in the subnational multi-stakeholder group (MSG) in Peru.</p> <p>The Secretariat thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries and encourages supporting companies to take part in MSGs in the EITI implementing countries in which they operate.</p>
EXPECTATION 1 Public support for the EITI	<i>Publicly declare and publish support for the EITI and the objective of the EITI Association to make the EITI Principles and the EITI Standard the internationally accepted standard for transparency in the oil, gas and mining sectors.</i>



Does the company publish a statement of support for the EITI and the objective of the EITI Association?	Yes
URL for Statement Support	ESG Databook 2025: https://www.smm.co.jp/en/sustainability/library/pdf/2025/ESG_Databook_EN.pdf International Organisation Webpage: https://www.smm.co.jp/en/sustainability/international/
Secretariat's assessment on Expectation 1	Expectation met
Secretariat comment	Statement of support published. See URLs International Organisation Webpage and ESG Databook 2025 p. 33
EXPECTATION 2 <i>Disclosures in accordance with the EITI Standard</i>	<i>Make comprehensive disclosures in accordance with the EITI Standard in all EITI implementing countries where the company or its controlled subsidiaries operate. Where not disclosed in other company reporting, publicly disclose a list of controlled subsidiaries operating in the oil, gas or mining sectors in EITI implementing countries.</i>
Does the company publish a list of controlled subsidiaries?	Yes
URL for controlled list of subsidiaries	Integrated Annual Report 2025: https://www.smm.co.jp/en/ir/library/integrated_report/pdf/2025/2025_All_EN.pdf
EITI implementing countries where the company operates.	CHILE PERU
Does the company make disclosures in accordance with the EITI Standard or in relation	Yes

to EITI implementing countries?	
Secretariat's assessment on Expectation 2	Expectation met
Secretariat comment	List of controlled subsidiaries published. See URL p. 156. Company assessed as making disclosures in EITI implementing countries in accordance with the Standard.
EXPECTATION 3 <i>Disclosure of taxes and payments in non-EITI implementing countries</i>	<i>Publicly disclose taxes and payments to governments at a project level in line with the EITI Standard in all non-EITI implementing countries where the company operates unless disclosure is not feasible. Where not feasible, the country-specific legal or practical barriers to disclosure should be publicly explained.</i>
Does the company publicly disclose taxes and payments to governments in non- EITI implementing countries where the company operates upstream in the oil, gas and mining sectors?	Partial
URL to disclosures of taxes and payments to governments in non-EITI implementing countries	ESG Databook 2025: https://www.smm.co.jp/en/sustainability/library/pdf/2025/ESG_DataBook_EN.pdf
Are the disclosures disaggregated by project?	No
Secretariat's assessment on Expectation 3	Expectation partially met
Secretariat comment	Sumitomo Metal Mining partially discloses taxes and payments to governments in non-EITI implementing countries. See URL ESG Databook p. 21.

	<p>The company does not disclose taxes and payments to governments disaggregated by project. The payments provided are of one payment type, income tax, and are not disaggregated by project.</p> <p>The Secretariat did not verify whether project-level disaggregation in all non-EITI implementing countries was adequate, as definitions vary across jurisdictions.</p>
<p>EXPECTATION 4 <i>Commodity trading transparency</i></p>	<p><i>Companies buying oil, gas and/or mineral resources from the state in EITI implementing countries, disclose volumes received and payments made in line with the EITI Standard and the EITI reporting guidelines for companies buying oil, gas and minerals from governments unless disclosure is not feasible.</i></p>
<p>Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?</p>	No
<p>If yes, which countries?</p>	N/A
<p>Does the company make disclosures in line with the EITI Standard and reporting guidelines?</p>	N/A
<p>URL for disclosure(s)</p>	N/A
<p>Secretariat's assessment on Expectation 4</p>	Expectation not applicable
<p>Secretariat comment</p>	Sumitomo Metal Mining does not buy oil, gas and/or mineral resources from the state in EITI implementing countries.
<p>EXPECTATION 5 <i>Disclosure of audited financial statements</i></p>	<p><i>In line with the EITI Standard, publicly disclose audited financial statements, or the main items (i.e., balance sheet, profit/loss statement, cash flows) where financial statement are not available.</i></p>



Does the company disclose its audited financial statements?	Yes
URL audited financial statements	Consolidated Financial Statements 2025: https://www.smm.co.jp/en/ir/library/consolidated_financial_statement/pdf/Consolidated_Financial_Statement_2025.pdf Independent Auditors Report 2025: https://www.smm.co.jp/en/ir/library/consolidated_financial_statement/pdf/Independent_Auditors_Report_2025.pdf
Secretariat's assessment on Expectation 5	Expectation met
Secretariat comment	Sumitomo Metal Mining discloses audited financial statements. See URLs.
EXPECTATION 6 Beneficial ownership transparency	<i>Publicly declare and publish support for beneficial ownership transparency and publicly disclose beneficial owners in line with EITI Standard, recognising that listed companies will disclose the name of the stock exchange, include a link(s) to stock exchange filings where they are listed and otherwise do what is required by applicable regulations and listing requirements.</i>
Does the company publish a statement of support for beneficial ownership transparency?	No
URL for statement of support for Beneficial Ownership	N/A
Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements?	Yes
Where disclosures are made according to stock	

exchange regulations, please provide the name of the stock exchange	Tokyo Stock Exchange
URL to stock exchange	TYO: https://www2.ipx.co.jp/tseHpFront/JJK020030Action.do;jsessionid=00BB672863E38D0E6A3FC51CC5DB2D312
URL for recent beneficial ownership disclosures	Integrated Annual Report 2025: https://www.smm.co.jp/en/ir/library/integrated_report/pdf/2025/2025_All_EN.pdf
Secretariat's assessment on Expectation 6	Expectation partially met
Secretariat comment	<p>Sumitomo Metal Mining do not publish a statement of support for beneficial ownership transparency.</p> <p>The company discloses beneficial owners in line with applicable regulations and listing requirements. Sumitomo Metal Mining is publicly listed on the Tokyo Stock Exchange. See URL.</p> <p>The company publishes further information regarding its ownership in the Integrated Annual Report 2024. See URL p. 157.</p> <p>To make further progress on Expectation 6, please publish a statement of support for beneficial ownership transparency.</p>
EXPECTATION 7 Due diligence processes and anti-corruption policies	<i>All EITI supporting companies are expected to engage in rigorous due diligence processes and publish an anti-corruption policy setting out how the company manages corruption risk, including how the company collects and takes risk-based steps to use beneficial ownership data regarding joint venture partners, contractors, and suppliers in its processes.</i>
Does the company publish an anti-corruption policy?	Yes
URL to the policy	<p>Basic Policies for Anti-Briberies: https://www.smm.co.jp/en/sustainability/management/bribery_prevention/</p> <p>Integrated Annual Report 2025: https://www.smm.co.jp/en/ir/library/integrated_report/pdf/2025/2025_All_EN.pdf</p>

	<p>Compliance Webpage: https://www.smm.co.jp/en/sustainability/management/compliance/</p> <p>Due Diligence Report for Responsible Sourcing of Copper, Nickel and Cobalt Raw Materials: https://www.smm.co.jp/en/sustainability/management/pdf/DD_Report_en.pdf</p>
<p>Does the company's anti-corruption policy describe how the company manages corruption risk with regards to identification and use of beneficial ownership data?</p>	<p>Partial</p>
<p>Secretariat's assessment on Expectation 7</p>	<p>Expectation partially met</p>
<p>Secretariat comment</p>	<p>Sumitomo Metal Mining publishes an anti-corruption policy. See URLs.</p> <p>Sumitomo Metal Mining's anti-corruption framework partially sets out how the company manages corruption risk through the identification and use of beneficial ownership data.</p> <p>The framework applies to all officers and employees of the SMM Group and prohibits all forms of corruption, defining key terms related to bribery and outlining risk-based steps to mitigate corruption risk.</p> <p>The company's compliance webpage describes anti-corruption measures the company implements including prior approval requirements for entertainment and gifts to public officials, and due diligence related to mineral sourcing and human rights. The webpage further communicates how the company implements its anti-corruption measures including through its "Whistle-Blowing System" and mandatory training on anti-corruption legislation.</p> <p>The Due Diligence Report for Responsible Sourcing of Copper, Nickel and Cobalt Raw Materials explains how suppliers are assessed through questionnaires and risk ratings, with controls applied to higher-risk entities, including consideration of supplier red flags. The policy does not outline whether or how the company</p>

	<p>collects or uses beneficial ownership data to manage corruption risk or as part of a due diligence process.</p> <p>The Secretariat encourages the company to strengthen its anti-corruption policy by clarifying how it collects and uses beneficial ownership data in its management of corruption risks to achieve fully met in this Expectation.</p>
<p>EXPECTATION 8 <i>Contract transparency</i></p>	<p><i>Publicly declare and publish support for governments' efforts to publicly disclose contracts and licenses that govern the exploration and exploitation of oil, gas and minerals in line with the EITI Standard, and contribute to public disclosure of contracts and licenses in EITI implementing countries consistent with government procedures.</i></p>
<p>Does the company publish a statement of support for contract transparency?</p>	<p>Yes</p>
<p>URL for statement of support for contract transparency</p>	<p>ICMM Joint Statement: https://www.icmm.com/en-gb/our-work/governance-and-transparency/mineral-resource-governance/contract-transparency</p>
<p>Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?</p>	<p>Yes</p>
<p>Secretariat's assessment on Expectation 8</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>As an ICMM member, the International Secretariat notes that the company subscribes to ICMM's collective statement of support for contract transparency.</p> <p>Company assessed to contribute to disclosure of contracts and licenses in EITI implementing countries.</p> <p>The Secretariat encourages the company to publish a statement of support for contract transparency on its own website.</p>
<p>EXPECTATION 9 <i>Gender Diversity</i></p>	<p><i>Publish a commitment and/or policy on gender diversity in the oil, gas or mining sectors and support reporting by EITI implementing countries</i></p>

<i>under the EITI Standard by disclosing employment in the sectors disaggregated by gender.</i>	
Does the company publish a commitment/policy on gender diversity?	Yes
URL for commitment/policy on gender diversity	Diversity Equity and Inclusion Webpage: https://www.smm.co.jp/en/sustainability/management/humanrights/humanrights_5.html
Does the company disclose employment data disaggregated by gender?	Yes
URL for gender disaggregated employment data	Diversity Equity and Inclusion Webpage: https://www.smm.co.jp/en/sustainability/management/humanrights/humanrights_5.html
Secretariat's assessment on Expectation 9	Expectation met
Secretariat comment	Sumitomo Metal Mining publishes a policy/commitment on gender diversity. See URL. SMM discloses employment data disaggregated by gender. The company also reports data on its gender pay gap. See URL.