

KDDI Summit Global Myanmar Company Limited

Human Rights Policy

Established: 13 Mar 2026

Policy Owner: KSGM Human Rights Committee

1. Purpose

As a joint venture established by KDDI Corporation and Sumitomo Corporation, KDDI Summit Global Myanmar Company Limited (“KSGM”) is committed to reflect the human rights commitments made by its parent companies in their respective Human Rights Policies¹ while adapting to KSGM’s specific country and operations context. This Policy draws on relevant guidance on responsible business conduct, including international standards and frameworks such as The United Nations Guiding Principles on Business and Human Rights (UNGPs), The OECD Due Diligence Guidance for Responsible Business Conduct (“OECD Guidance”), The International Bill of Human Rights and The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

We will update this Policy periodically based on operational circumstances and feedback from relevant stakeholders.

We recognise that we have a responsibility to respect human rights, We seek to fulfil this responsibility throughout our own operations, and by providing appropriate advice and training to and exercising leverage with suppliers, business partners and other relevant actors where appropriate.

2. Scope of Application

This policy applies to all our directors, officers, employees. We also encourage our suppliers and business partners to understand and practice this policy to fulfil our social responsibility.

¹ KDDI: <https://www.kddi.com/english/corporate/kddi/philosophy/human-rights/>
Sumitomo: <https://sumitomocorp.disclosure.site/en/themes/30>

3. Compliance with Domestic and International Law and International

We seek to comply with both applicable national laws and regulations, and with international law. Where national laws are applied in a manner that is inconsistent with international law, we will seek, to the greatest extent possible, to respect international human rights.

4. Enhanced Human Rights Due Diligence

Recognizing the current high-risk business environment, we commit to conducting ongoing, enhanced human rights due diligence, in line with the UNGPs and OECD Guidance, as well as international best practice on due diligence in conflict affected environments. This includes:

- Identification and assessment of actual and potential human rights impacts linked to our own operations.
- Implement cessation, prevention and mitigation measures.
- Ongoing monitoring and review of the operating context in Myanmar, including how it affects human rights risks and mitigation measures.
- Using leverage to prevent or mitigate impacts directly linked to our services and providing adequate remedial measures where we have caused or contributed to adverse human rights impacts, where appropriate.
- Responsible administration of our business, including consideration of modification, suspension, or disengagement of activities and services where risks cannot be adequately prevented or mitigated, where appropriate.

5. Stakeholder Engagement

We recognise the importance of ongoing, meaningful engagement and dialogue with relevant stakeholders, including employees, supply chain workers, civil society actors, and end-users. Stakeholder engagement will be conducted with due regard to safety, confidentiality.

6. Grievance Mechanisms

We are committed to providing and supporting accessible channels through which concerns related to human rights impacts can be raised. We will endeavour to ensure that grievance mechanisms are consistent with the standards outlined in the UNGPs,

and will ensure that individuals who raise concerns in good faith will not be disadvantaged as a result of making reports.

7. Education and Awareness

We will directly provide or advise the provision of appropriate training and awareness-raising with respect to human rights for our directors, officers, employees. We also ensure that our relevant suppliers and business partners and their employees understand and abide this Policy.

8. Transparency and Reporting

We will disclose appropriate information regarding our human rights commitments, due diligence efforts, and implementation, taking into account security, legal, and confidentiality considerations.

9. Other

Given the country and operational context in which this Policy is implemented, we may, in exceptional circumstances, need to apply temporary deviations where necessary to address serious and immediate risks to the life, security, or freedom of movement of our employees. We will document the applicability of the deviations and review such exemptions periodically.