



## Corporate Governance

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## Basics of Sumitomo Corporation

Sumitomo Corporation Group's Corporate Mission Statement, consisting of the Management Principles and the Activity Guidelines, is the fundamental and ultimate value standard of the Company. The Management Principles are the redefinition of Sumitomo's business philosophy, which has been cultivated over its 400 years of business history, from a contemporary and global perspective set out in a simple and clear structure. The Activity Guidelines stipulate the required behavior of the Company and its officers and employees and provide the means to realize the Management Principles.

### Management Principles and Activity Guidelines

The first sentence of the Corporate Mission Statement "We aim to be a global organization that constantly stays a step ahead in dealing with change, creates new values, and contributes broadly to society" constitutes the "Corporate Vision" of the Company.

The first article of the Management Principles "To achieve prosperity and realize dreams through sound business activities" represents the "Corporate Mission," the second article "To place prime importance on integrity and sound management with utmost respect for the individual" represents the "Management Style" and the third article "To foster a corporate culture full of vitality and conducive to innovation" represents the "Corporate Culture" of the Company, respectively.

Sumitomo Corporation shall share this value standard throughout the Group, and shall practice it in each business activity to contribute to realization and improvement of the economic and social value of all stakeholders of the Company.

### Sumitomo's Business Philosophy

The origin of the Management Principles lies in Sumitomo's business philosophy, which has been inherited and adhered to by the Sumitomo Group for the more than 400 years since its foundation.

In essence, it tells us that "We should place prime importance on integrity and sound business activities, and should never be moved from joy to sorrow by daily market fluctuations. But, when faced with a paradigm shift, we must take the lead in striving for structural innovation. In this way we can and should create meaningful values not only for ourselves but for society as well."

It implies a universal value valid enough even now, but more than 400 years have passed. There are some expressions that are too profound for the officers and employees of today, and other articles requiring some complementing for a company doing business on a global basis like Sumitomo Corporation. Thus, we have translated it into plain language and reorganized it in a clear structure in the Management Principles formulated in 1998.

### Corporate Mission Statement

#### Corporate Vision

We aim to be a global organization that constantly stays a step ahead in dealing with change, creates new value, and contributes broadly to society.

#### Management Principles

##### Corporate Mission

- To achieve prosperity and realize dreams through sound business activities

##### Management Style

- To place prime importance on integrity and sound management with utmost respect for the individual

##### Corporate Culture

- To foster a corporate culture full of vitality and conducive to innovation

#### Activity Guidelines

- To act with honesty and sincerity on the basis of Sumitomo's business philosophy and in keeping with the Management Principles
- To comply with laws and regulations while maintaining the highest ethical standards
- To set high value on transparency and openness
- To attach great importance to protecting the global environment
- To contribute to society as a good corporate citizen
- To achieve teamwork and integrated corporate strength through active communication
- To set clear objectives and achieve them with enthusiasm



Monjuin Shiigaki ("Founder's Precepts")  
Showing Sumitomo's business philosophy  
(around 1650, from Sumitomo Historical Archives)

# Corporate Governance System

We believe that the ultimate goals of corporate governance are “improving management efficiency” and “maintaining sound management” as well as “ensuring management transparency” to achieve the first two goals. Based on this belief, we are working to establish a corporate governance system that serves the interests of shareholders and all other stakeholders.

## Past Initiatives to Strengthen and Enhance Corporate Governance

To date, we have strengthened and improved our corporate governance system through initiatives covering many points, such as optimizing the size of the Board of Directors, setting term limits for the Chairman of the Board of Directors and the President and CEO, shortening the terms of Directors, establishing advisory bodies, strengthening the corporate auditors system, introducing the executive officer system, and appointing external advisors.

Our approach to corporate governance is embodied in the “Sumitomo Corporation Corporate Governance Principles,” which can be accessed from the following web page.

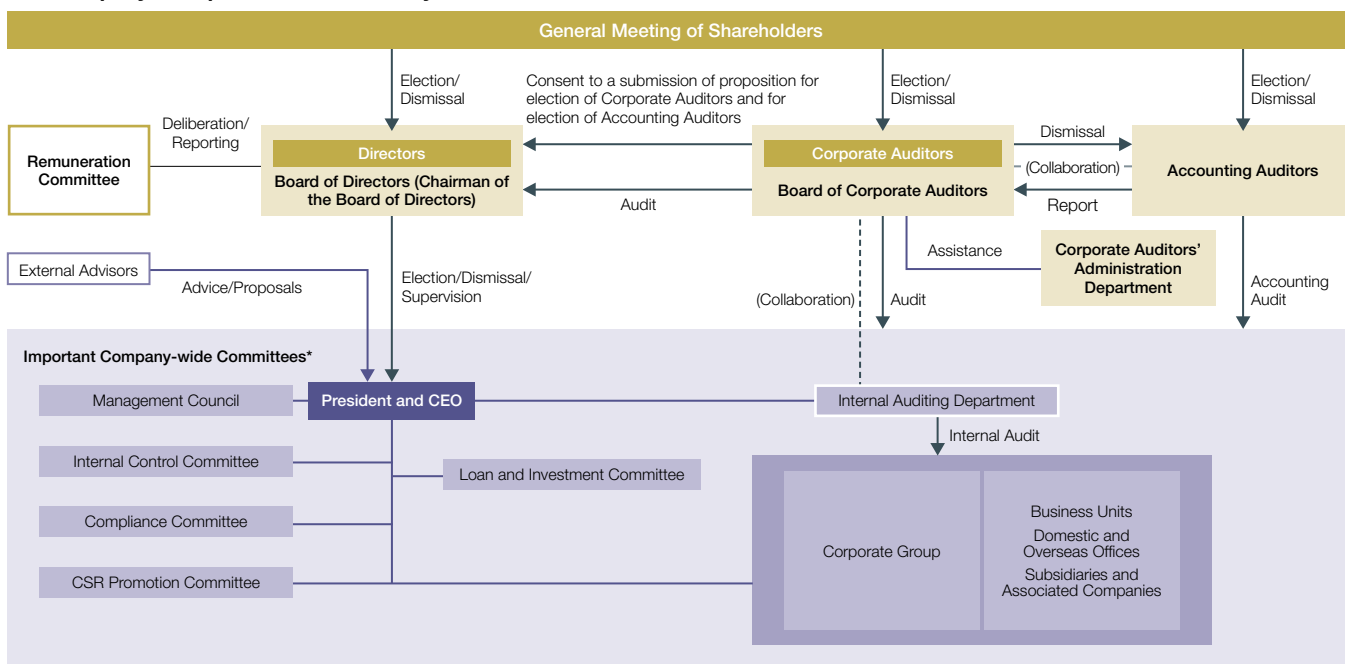
URL: <http://www.sumitomocorp.co.jp/english/company/governance/detail01.html>

## Features of Our Corporate Governance System

Even after a corporation with committees based system of corporate governance became able to be adopted by the Commercial

Code revised in 2002, we have maintained our existing corporate auditor system while enhancing and reinforcing it through auditing from diversified external viewpoints and with opinions and advice from additional external advisors, which, we believe, is the most legitimate to improve the effectiveness of our corporate governance. Based on “Sumitomo’s business philosophy,” we have established the Sumitomo Corporation Group’s Management Principles and Activity Guidelines, and work to enforce these principles and guidelines among all officers and employees, in order to share the basic values that must be respected by the Sumitomo Corporation Group, including compliance with laws and regulations. From the perspective of maintaining sound management, we have developed a system for ensuring compliance with laws and regulations by establishing a Compliance Committee and introducing a “Speak Up System” for internal reporting, among other measures. Guided by the belief that management itself must conduct its duties with high ethical standards, we have clearly stated in the “Sumitomo Corporation Corporate Governance Principles” that in principle,

## The Company’s Corporate Governance System



\* Management Council: Exchange of opinions and information on basic policy and important matters related to management  
 The Internal Control Committee is tasked with the overall management and timely evaluation of internal controls, and the development, implementation and promotion of basic internal control policies, among other duties  
 Loan and Investment Committee: Deliberation of important matters, such as investment and financing  
 Compliance Committee: Enhancement of Group compliance focused on “maintaining sound management”

the Chairman of the Board of Directors and the President are each limited to terms of up to six years.

We will monitor global trends and legislation concerning companies while preserving our corporate culture as a Japanese company. At the same time, we will observe the benefits of different corporate governance frameworks in other countries.

Thus, Sumitomo Corporation will continually study the most appropriate corporate governance system.

## Framework for “Improving Management Efficiency” and “Maintaining Sound Management”

### Directors and the Board of Directors

#### ■ Optimization of Size of Board of Directors

We halved the number of Board members from 24 in 2003. As of July 2011, the Board has 12 members. Through this optimized Board of Directors, which oversees the operations of the business and serves as the Company’s decision-making body concerning key management matters, we aim to facilitate substantial and active discussion as well as to promote greater efficiency and effectiveness in the decision-making process.

#### ■ Limiting Terms of Directors

In June 2005, the terms of Directors were reduced from two years to one year. We aim to clarify the responsibility of management among members of management each fiscal year. This, in turn, helps ensure fast reaction times to changes in business conditions.

#### ■ Limits on Terms of the Chairman of the Board of Directors and the President and CEO

In principle, the positions of Chairman of the Board of Directors and

the President and CEO are clearly defined and separate in order to ensure mutual supervision and both positions cannot be held simultaneously by one person. In principle, the Chairman of the Board of Directors and the President and CEO are each limited to terms of six years. These limitations on the tenure of top management help minimize the possibility of governance problems.

#### ■ Establishment of the Advisory Body to the Board of Directors

With the aim of enhancing the transparency and objectivity of decision-making processes with regard to the remuneration of Directors and Executive Officers, we established the Remuneration Committee. Functioning as an advisory body to the Board of Directors, no fewer than half of the Committee members are from outside the Company. The Remuneration Committee is in charge of studying remuneration and bonuses of directors and executive officers, and reports the results of its studies to the Board of Directors.

### Corporate Auditors and the Board of Corporate Auditors

#### ■ Enhancement of Corporate Auditing Framework

To further strengthen external views within the corporate auditing framework, we added one external auditor in June 2003, bringing the number of external auditors to three out of the five members on the Board of Corporate Auditors. Of these three, two are legal experts (a former Public Prosecutor General and a former President of the Tokyo High Court) and one is an accounting expert—ensuring an auditing system that incorporates a diversity of perspectives. The three external auditors possess a high degree of independence, such as by satisfying the conditions for independent officers stipulated by the listing rules of Japanese stock exchanges.

## Particulars Regarding the Remuneration of the Company’s Directors

Particulars regarding the remuneration of the Company’s Directors and Corporate Auditors for fiscal 2010 are as follows:

Classification	Number of payees	Total amount of remuneration, etc.	Additional information
Directors	12 persons	1,355 million yen	The breakdown of the total remuneration in the column to the left is as follows: (1) Monthly remuneration 725 million yen (2) Bonuses subject to the resolution of the 143rd Ordinary General Meeting of Shareholders 515 million yen (3) Amount recorded as expenses for granting the Ninth New Share Acquisition Rights (issued on July 31, 2010) 15 million yen (4) Amount recorded as expenses for granting the Fifth New Share Acquisition Rights (for a stock-linked compensation plan) (issued on July 31, 2010) 77 million yen (5) Amount recorded as expenses for granting the Fourth New Share Acquisition Rights (for a stock-linked compensation plan) (issued on July 31, 2009) 24 million yen
Corporate Auditors (particulars relating to Outside Corporate Auditors)	6 persons (3 persons)	125 million yen (38 million yen)	The remuneration in the column to the left is the aggregate total of the Corporate Auditors’ monthly remuneration.

1. As of the end of the fiscal year, we had 12 Directors and 5 Corporate Auditors.

2. No Director of the Company is concurrently an employee of the Company.

3. The maximum amount of monthly remuneration to Directors is 75 million yen per month, resolved at the 118th Ordinary General Meeting of shareholders held on June 27, 1986.

4. The maximum amount of monthly remuneration to Corporate Auditors is 11 million yen per month, resolved at the 125th Ordinary General Meeting of shareholders held on June 29, 1993.

5. In addition to the remuneration above, the Company pays retiring Directors a retirement bonus in appreciation of their service.

6. The total of each amount of money in “Additional information” of Directors presented above is not equal to “Total amount of remuneration, etc. pertaining to this fiscal year” of Directors presented above, because each such amount of money is rounded to the nearest million.

Reason for selection and the profile of the Outside Corporate Auditors are as follows.

### Akio Harada

#### Reason for selection

Akio Harada has a broad range of expertise and long years of experience as both a prosecutor and lawyer. He was selected and asked to perform audits from a broad perspective on the grounds his character and insight is most suited for the position.

#### Profile

December 1999	Chief Prosecutor, Tokyo High Prosecutors Office
July 2001	Prosecutor General
October 2004	Admitted to the Bar (incumbent)
June 2005	Corporate Auditor of Sumitomo Corporation (incumbent)

### Tsuguoki Fujinuma

#### Reason for selection

Tsuguoki Fujinuma has a broad range of expertise, including on matters of finance and accounting, and long years of experience as an accountant. He was selected and asked to perform audits from a broad perspective on the grounds his character and insight is most suited for the position.

#### Profile

June 1993	Representative Partner, Showa Ota & Co. (now Ernst & Young ShinNihon LLC)
May 2000	Chairman, International Federation of Accountants
July 2004	Chairman, The Japanese Institute of Certified Public Accountants
July 2007	Advisor, The Japanese Institute of Certified Public Accountants (incumbent)
June 2008	Corporate Auditor of Sumitomo Corporation (incumbent)

## Message From an Outside Corporate Auditor



### Tsuguoki Fujinuma

Outside Corporate Auditor  
Certified Public Accountant  
Appointed as outside corporate auditor in 2008

During my career, I have been involved with corporate accounting in many different roles, both in Japan and overseas. In my former roles, I have served as President of the International Federation of Accountants and the President and Chairman of The Japanese Institute of Certified Public Accountants. In 2008, I was appointed as an outside corporate auditor of Sumitomo Corporation. In this role, I conduct auditing duties while applying my knowledge and experience to the fullest extent.

Let me share with you several points that I believe are characteristic of corporate governance at Sumitomo Corporation. First, all officers and employees have a strong awareness of the importance of corporate governance issues. Second, the corporate governance system is functioning effectively. The former point illustrates just how deeply Sumitomo's Management Principles and its underlying 400 year-old business philosophy permeate the organization. The latter point is a testament to the Company's willingness to incorporate a breadth of opinions from outside the organization, and the culmination of innovative steps to actually do so.

For example, the Company's emphasis on external perspectives is evident in how it has instituted a system where three out of five corporate auditors are outside corporate auditors. However, I believe that the Company has also developed an environment that is conducive to eliciting my frank personal opinions. Specifically, the Company provides an opportunity every month for me to openly discuss a range of topics with the Chairman and President, ranging from current affairs to progress on important projects. Opportunities are also provided at the Board of Corporate Auditors meetings to receive briefings in advance on agenda matters that will be submitted to the Board of Directors. These opportunities enable a deeper and more meaningful exchange of opinions.

As the globalization of business proceeds and major changes reshape the business landscape, I believe that general trading companies will fulfill an increasingly important role going forward. I am convinced that Sumitomo Corporation can fulfill such a role through solid execution of its new Medium-Term Management Plan:  $f(x)$ . Sumitomo Corporation was also one of the first companies in Japan to adopt International Financial Reporting Standards (IFRS). I hope to put my insights as an IFRS Foundation\* Trustee Vice-Chair to good use in providing appropriate advice on the practical implementation of IFRS.

\* The supervisory body of the International Accounting Standards Board (IASB). The IFRS Foundation is working in the public interest to develop high-quality international accounting standards that provide transparent and comparable information in general purpose financial statements.

## Message from an External Advisor



### Minoru Noda

External Advisor  
Professor, Graduate School of Global Business,  
Meiji University  
Appointed as External Advisor to the Company in 2011

When I was working for a prominent think tank, I used to conduct analysis of what affected consumer behavior. But once I came to the realization that it is people that moved markets, I have consistently focused on People in Organizations. Based on that theme, in recent years, I have been conducting ongoing research focused on energizing middle management and building their organizations.

My connection to date with Sumitomo Corporation had been from the standpoint of a lecturer at their in-house training sessions. But now that I have been appointed an external advisor, I'd like to fulfill two new roles. The first is to offer advice and suggestions related to building organizations and nurturing people. Going forward, Sumitomo Corporation aims to build an organization and foster personnel in a manner conducive to create more businesses. I want to contribute to this process by drawing on my expertise as a specialist.

My second role is to offer advice and suggestions on common sense within Sumitomo Corporation. My impression is that Sumitomo Corporation's organization is a well balanced one, based on a relationship of mutual trust among all officers and employees. The Company needs to be flexible enough, however, to bring outside ideas in, and to keep internal common sense from slipping into complacency. To this end, I will seek to give my opinions from an outside perspective, aimed at modifying and expanding the meaning of common sense. I recognize that a system of external advisors helps create an effective framework for implementing these initiatives, because it facilitates the frank and smooth exchange of opinions in view of Sumitomo Corporation's management issues and trends.

The concern is rising that Japan's influence may wane as its population decreases amid an increase in the global population. Under these circumstances, perhaps the time has come to seriously consider what we as a people must do and what roads we must take. In the past, trading companies had played a major part in the expansion stage of the Japanese economy. Going forward, however, I think it will become their important task to draw a new vision for Japan in an era of paradigm change, further contributing to the global economy. Together with Sumitomo Corporation, I am committed to shouldering my responsibility in pursuing that quest.

### Mutsuo Nitta

#### Reason for selection

Mutsuo Nitta has a broad range of expertise and long years of experience as both a judge and lawyer. He was selected and asked to perform audits from a broad perspective on the grounds his character and insight is most suited for the position.

#### Profile

December 2004	President of the Tokyo High Court
April 2007	Admitted to the Bar (incumbent)
October 2007	Commissioner of the Tokyo Metropolitan Public Safety Commission
April 2008	Visiting Professor of the Meiji University Law School (incumbent)
June 2009	Corporate Auditor of Sumitomo Corporation (incumbent)

#### ■ Ensuring Audit Effectiveness

Corporate Auditors attend meetings of the Board of Directors and all other important internal meetings, to obtain the information necessary for proper auditing. Corporate Auditors also meet the Chairman of the Board of Directors and the President and CEO every month to exchange opinions on material issues regarding management policy and auditing. Moreover, the Corporate Auditor's Administration Department is assigned to assist Corporate Auditors, so that the auditing system functions effectively and without hindrance.

#### ■ Collaboration between Internal Auditing Department and Accounting Auditors

To ensure audit efficiency, Corporate Auditors interact closely with the Internal Auditing Department, receiving reports on internal audit plans and their results in a timely manner. In addition, Corporate Auditors exchange information with and monitor the auditing activities of the Accounting Auditors through regular meetings. By attending audit review meetings with the Accounting Auditors and observing inventory audits, the Corporate Auditors constantly work to improve audit efficiency and quality. Furthermore, Corporate Auditors attend meetings of the Internal Control Committee and request reports on the status of internal control systems from other departments responsible for internal control, along with their cooperation on audits.

#### Introduction of an Executive Officer System

We have introduced an executive officer system with the aim of clarifying the responsibilities and authority for execution and strengthening the monitoring function of the Board of Directors. We currently have 36 Executive Officers (as of July 31, 2011) selected by the Board of Directors. Of these, 11 Executive Officers also serve concurrently as Directors, including seven who are also General Managers of Business Units. In this way, we aim to prevent

gaps between decisions made at Board of Directors meetings and the execution of those decisions.

#### Appointment of External Advisors

Management Council members meet with outside specialists employed as external advisors to incorporate outside perspectives into our management. In this way, external advisors provide us with advice from diverse perspectives on various themes related to management issues. External advisors also give speeches and lectures in their respective areas of expertise, such as leadership and career development, to employees at various levels within our organization.

#### System for Ensuring Management Transparency

##### Basic Policy on Information Disclosure

To bring an accurate understanding of the Company's management policies and business activities to all our stakeholders, we shall strive to make full disclosure, not limiting ourselves to the disclosure of information required by law but also actively pursuing the voluntary disclosure of information.

#### Communicating with Shareholders and Other Investors

##### ■ Encouraging the Execution of Voting Rights at the General Meeting of Shareholders

We send out a Notice of Convocation to shareholders three weeks prior to each regularly scheduled General Meeting of Shareholders. For the convenience of overseas shareholders, we also provide an English-language translation of the notice on our website. We have allowed our shareholders to exercise their voting rights via the Internet using personal computers since 2004 and via the Internet using mobile phones since 2005. In 2007, we introduced the Electronic Voting Platform operated by Investor Communication Japan, Inc. (ICJ), instituted by Tokyo Stock Exchange, Inc. and others. The new platform allows institutional investors sufficient time to thoroughly examine the propositions to be resolved at the meeting.

#### ■ Disclosure of Various Information

Our corporate website endeavors to ensure the provision of proactive and timely disclosure of various documents and materials containing information that may be useful in making investment decisions. These documents and materials include financial results, *yukashoken houkokusho* (Japanese annual securities reports), and the Company's presentation materials. Moreover, the website provides Sumitomo Corporation's *Annual Report*, *Report on Responsibility & Sustainability* and *SC News*, the Group's public relations news magazine. The website also presents features compiled to introduce Group-wide topics such as the projects the Company operates all over the world.

#### ■ Investor Relations

In addition to working to enhance the disclosure of information on our website, in order to ensure direct communication with shareholders and other investors, we hold quarterly meetings attended by management to provide information on our financial results for analysts and institutional investors. For overseas investors, we periodically visit the United States, the United Kingdom, and other countries in Europe and Asia to hold one-on-one meetings with investors in each region. In addition, in fiscal 2004 we began regularly holding meetings with individual investors in Japan. In fiscal 2010, we held such meetings in three cities. (Considering the affects of the Great East Japan Earthquake, we reduced the number of meetings in fiscal 2010.)

While working to strengthen and enhance our corporate governance structure and systems, from the perspectives of "improving management efficiency" and "maintaining sound management," we will continue to further strengthen internal auditing, risk management and compliance, to further improve the effectiveness of internal control.

#### Website



Homepage  
<http://www.sumitomocorp.co.jp/english/>



Investor Relations  
<http://www.sumitomocorp.co.jp/english/ir/>

#### Publications



Annual Report



Report on Responsibility & Sustainability



SC NEWS

# Internal Control and Internal Audits

The Sumitomo Corporation Group has strengthened its internal controls in order to retain the trust of all its stakeholders.

## Internal Control

The Sumitomo Corporation Group is formed of seven Business Units as well as regional organizations in Japan and overseas. The Business Units, organizations and group companies collectively work together in broad business fields. It is essential that we provide a uniform standard in operational quality at these businesses, irrespective of their business sector or region. This standard must also meet the expectations of our stakeholders.

From this perspective, we launched our Internal Control Program in 2005 to perform a comprehensive evaluation of the status of internal controls using a standards-based checklist. This Internal Control Program checklist covers approximately 350 points pertaining to general operations that should be common across the Group, including risk management, accounting and financial controls and compliance.

To ensure that this checklist assessment is conducted effectively, we make concerted efforts to educate all our officers and employees, including those at Group companies, on the essential fine points of internal controls that must be verified.

In August 2010, we launched a fully redesigned Internal Control Committee. The new committee is responsible for the management and evaluation of overall internal control across the entire Sumitomo Corporation Group and the development and implementation of basic policies on internal control. While the committee promotes group-wide activities, business units and regional organizations in Japan and overseas are implementing their own internal control activities in place of the previous group-wide, comprehensive checklist assessment.

These “internal control activities” specifically refer to the planning, implementation, evaluation and improvement of our internal control systems and processes. Each organizational unit carries on these activities continuously on a daily basis with timely and optimal support from its Planning & Administration Department, contributing to the sustainable growth and development of the Group.

### ■ Fulfillment of Legal Requirements

In recent years, due to social demands, legislation requiring companies to constantly improve and monitor their internal control systems has been passed under the Japanese Company Law and the Financial Instruments and Exchange Law. We have treated meeting these legal obligations as an opportunity to further reinforce our internal control program, which we had implemented

ahead of the enactment of this legislation. Our efforts in this area are ongoing and not transitional.

The Japanese Company Law, which came into effect in May 2006, calls for companies to establish “systems ensuring that the execution of duties by directors conforms to legal regulations and their Articles of Incorporation as well as systems ensuring that business processes are handled appropriately.” Having previously established various systems and frameworks, the Sumitomo Corporation Group fulfills the requirements of this law.

To comply with the internal control reporting rules stipulated in the Financial Instruments and Exchange Law, which took effect on April 1, 2008, we are tracking and evaluating our internal controls with regard to the reliability of financial reporting, as required by the law, through the effective application of Internal Control Program results and its promotion structure.

Through the aforementioned efforts and measures, the Sumitomo Corporation Group aims to continuously improve the quality of its operations.

## Internal Audits

The Internal Auditing Department, which reports directly to the President, was established as an independent organization to monitor company-wide operations. Internal audits are performed at all organizations within the Company and Group companies. The internal audit results are reported directly to the President every month, and reported regularly to the Board of Directors.

The Internal Auditing Department checks comprehensively organizations’ assets, the way of risk-management, status of compliance and business processes to find their problems and risks inherent. The Internal Auditing Department helps to raise the quality of organizational management by encouraging voluntary improvements and evaluating the effectiveness and the validity of each process.



# Compliance

Positioning compliance as a basic premise for all corporate activity, Sumitomo Corporation is building a compliance structure in accordance with clearly defined policies. In maintaining strict adherence to this compliance structure, we are ensuring our existence as a going concern and securing our credibility and status.

## Policies and the Reporting Structure of Corporate Compliance

It is our policy that both officers and employees should never risk transgression in pursuit of profit for the Company. In order to promote compliance, Sumitomo Corporation established the Compliance Committee under the direct supervision of the President and CEO. The Compliance Committee is responsible for preparing the Company's Compliance Manual and distributing it to all officers and employees. The Compliance Manual covers the following 19 Guiding Principles to ensure the Company's bottom line: "If there is even a trace of doubt, don't do it." If a potential compliance problem is detected, we continuously encourage our employees to report it to their supervisors or the relevant departments immediately, so that the best countermeasures can be implemented swiftly.

## Compliance Training and Education

Employees have access to the latest version of the Compliance Manual and other manuals detailing applicable laws and regulations on the Company's intranet. We also offer various training programs and educational activities on compliance, including: programs for specific groups, such as employees, managers and corporate officers new to the Company; seminars provided by each Business Unit; seminars targeted at all officers and employees; and seminars for overseas offices and Group companies. We also make use of various domestic and overseas conferences for compliance education. In addition, we hold e-learning compliance seminars open to employees from all levels and plan to continue these seminars for new and other employees. Such e-learning is also held at Group companies.

## Guiding Principles

Business Activities	Corporate Citizen as a Member of Society	Maintenance of a Good Working Environment	Personal Interest
<ul style="list-style-type: none"> <li>• Observing Antimonopoly Laws</li> <li>• Security Trade Control</li> <li>• Customs / Controlled Items</li> <li>• Compliance with Applicable Laws</li> <li>• Respecting and Protecting Intellectual Property Rights</li> <li>• Prohibition of Unfair Competition</li> <li>• Information Management</li> <li>• Preservation of the Environment</li> <li>• Overseas Business Activities</li> </ul>	<ul style="list-style-type: none"> <li>• Prohibition on Giving Bribes</li> <li>• Prevention of Unlawful Payments to Foreign Governmental Officials</li> <li>• Political Contributions</li> <li>• Confrontation with Antisocial Forces</li> </ul>	<ul style="list-style-type: none"> <li>• Respect for Human Rights*</li> <li>• Prohibition of Sexual Harassment</li> <li>• Prohibition on Abuse of Authority</li> </ul>	<ul style="list-style-type: none"> <li>• Insider Trading</li> <li>• Conflict of Interest</li> <li>• Proper Use of Information Systems</li> </ul>

## Speak-Up System

If an employee becomes aware of a possible compliance problem, he or she can pass the information along the chain of command. In addition, the "Speak-Up System" was introduced to allow individuals to report a potential problem directly to the Compliance Committee. Outside legal counsel and our Corporate Auditors have been included as additional points of contact to further augment the system. Although, in principle, reporting individuals are asked to identify themselves so that they can be updated on the outcome of their cases, Company rules state that both the identity of such individuals and the nature of the information provided are kept confidential, and that no negative repercussions will redound on the reporting employees due to such reporting. The Compliance Committee is responsible for handling all the information it receives in an appropriate manner.

## Speak-Up System Diagram



# Risk Management

In order to cope effectively with the diversifying risk environment, we have built a risk management framework by developing our risk management approach from a micro to a macro perspective, and shifting our focus from “minimizing losses from individual transactions” to “maximizing corporate value.” This framework is strongly linked to the management plan, playing a critical role in supporting the efficient management of our corporate resources.

## The Purpose of Risk Management

We define “risk” as “possibility of losses due to the occurrence of anticipated or unanticipated situations” and as “possibility of not achieving the expected return on business activities.” We have set the following three items as the purpose for our risk management activities.

### 1. Stabilize Performance:

Minimize discrepancies between the plan and the actual results

### 2. Strengthen Financial Base:

Maintain Risk-adjusted Assets within the buffer (shareholders' equity)

### 3. Maintain Corporate Reputation:

Fulfill CSR requirements and preserve corporate reputation

## Risk Management Basic Policy

We classify our risks into two categories: Quantifiable risk and Non-quantifiable risk. Quantifiable risk is defined as “value creating risk,” where we proactively take to gain the return. Our policy is to maximize the risk-adjusted return while maintaining Risk-adjusted Assets within our buffer.

Non-quantifiable risk is defined as “value breaking risk,” which only generates losses when it surfaces. We are building a framework that prevents or minimizes the probability of this risk to materialize.

## Risk Management Framework

### Managing Quantifiable Risk

#### ■ Managing Investment Risk

Once an investment is made, it is often difficult to make a withdrawal decision and the loss impact is usually significant in scale. To manage the investment risk, we have in place an integrated framework covering the entry process to the exit process. For the entry process, we carefully select investments that exceed the hurdle rate, a threshold for the rates of return on new investments relative to the cost of capital. In case of new investments for large-scale, important projects, cases are put forward to the Loan and Investment Committee for thorough examination, and if such investments significantly underperform the original business plans, Value-Up plans shall be formulated and executed with the support of the Committee. When the performance of investments falls short of required standards after a certain period from their inception, we

have an Exit Rule that shall designate those investments as “Investments to withdraw from.”

#### ■ Managing Credit Risks

We have incorporated our original credit rating model, the Sumisho Credit Rating (SCR), to assess our customers' credit risk. The authority level to provide credit exposure to customers depends on the assigned credit rating, and the risk weight is set for each rating category. In addition, we regularly review the customers' credit limits and appropriately manage the credit exposure under those limits.

#### ■ Managing Market Risks

We set limits on contract balances as well as the maximum amounts of allowable losses for six months or a full year for commodity and financial instrument transactions. At the same time, we constantly monitor the potential amount of loss, (Value at Risk (VaR)—an estimate of potential risk or in case the total figures of realized and unrealized gain/loss are negative at the time of monitoring, the total of VaR and the relevant negative figures), to ensure that the potential amount of loss falls within the maximum amounts of allowable losses. In addition, we conduct liquidity risk management for each product on an individual futures market basis in order to be prepared in the event that it becomes difficult to close positions due to shrinking liquidity. The Financial Resources Management Group undertakes both the back and middle office functions in order to completely separate those functions from the Business Units, thereby enabling us to maintain the soundness of internal checks.

#### ■ Managing Concentration Risks

As we are operating globally and engaging in a variety of business fields, we need to ensure that the risks are not excessively concentrated in particular areas. In order to avoid overly concentrated exposure in certain countries and regions, we have in place a country risk management system. In addition, in order to avoid the excessive concentration of resources in any specific field and refine our business portfolio, we thoroughly discuss the amount of Risk-adjusted Assets distributed to each unit and business line in meetings such as the “strategy conference,” which is held among CEO and general managers of each unit and “loan and investment committee,” which deliberates on important investment and financing.

### Managing Non-quantifiable Risks

Non-quantifiable risks are those that must be borne, but for which we cannot expect returns. These include litigation and other legal risks, operational risks such as clerical mistakes or fraud acts, and natural disaster risk. Some of these risks involve events that rarely occur but could have a critical impact on our operations once they arise. Our basic policy is to prevent or minimize the probability of these risks to materialize. Accordingly, we periodically assess non-quantifiable risks on a global and consolidated basis. We do this through a range of initiatives to strengthen our internal control across the Group under the leadership of the Internal Control Committee as well as through independent activities by our business units and regional organizations in Japan and overseas. Based on the assessment result, we continuously search for a more efficient and effective organizational structure and procedures to improve the quality of our business operations.

### Embedding the Sense of Risk Management

Although we have been constructing the best possible risk management framework to cope with diversified risks, we cannot completely prevent the incurrence of loss in the course of business activities only by the framework itself. We are putting our efforts into implementing the initiatives that enable us to quickly identify the occurrence of losses in order to suppress loss accumulation and prevent the contagion effects that lead to secondary losses. These initiatives include devising ways to quickly identify the cause of losses and share such information among top management and related departments. We have compiled a database of such loss

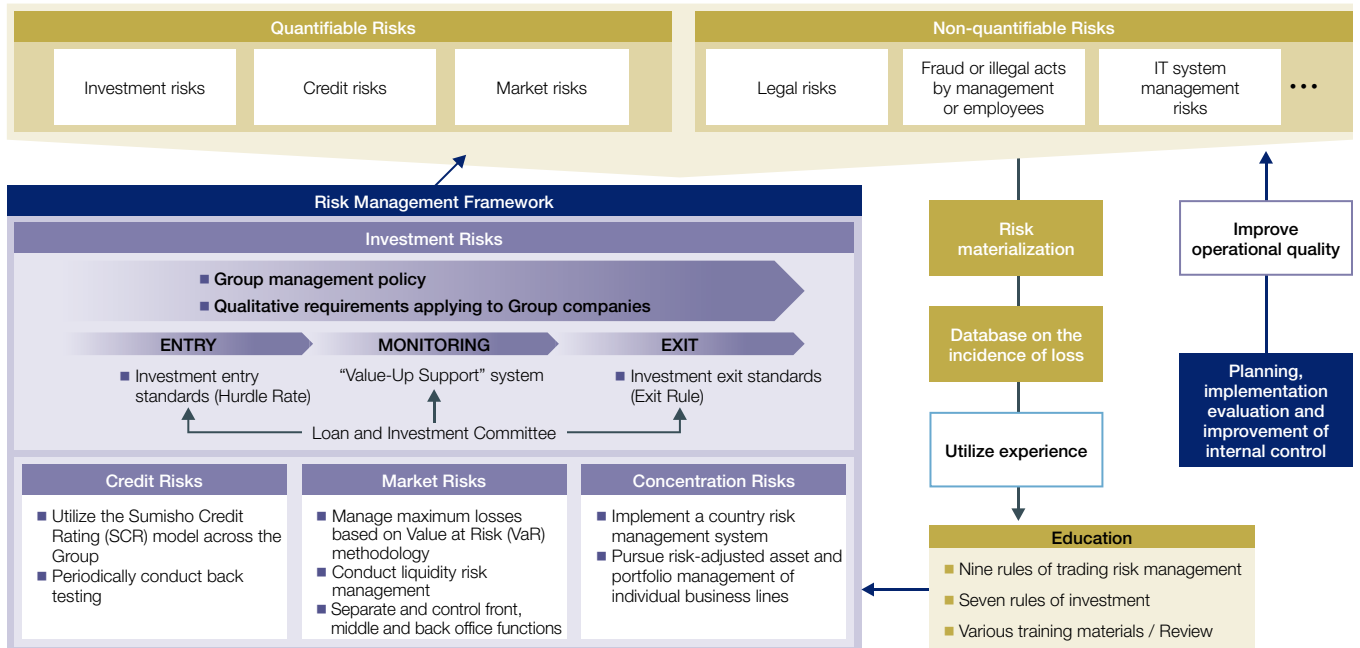
information that allows for the systematic analysis of the causes of loss-incurring events. These analyses are used as training materials for employees as part of various educational programs. Through this knowledge feedback process, individual employees can upgrade their risk management capabilities, supporting the prevention of the same kind of loss events.

### Eyeing the Future of Risk Management

Over the past decade, Sumitomo Corporation has created a formidable risk management framework by studying advanced methods and processes. Our goal is to implement the best practices in risk management while maintaining the flexibility to adapt to changes in the business environment. The surrounding environment is continually changing, however, and new business model that we could never have imagined are emerging on a daily basis. Responding to changing circumstances in a timely and effective manner, we continually upgrade our risk management under the direction of top management.

### Information Security Control Structure

Sumitomo Corporation works to enhance its information management system to maintain and improve information security. Our approach to this end includes the development of internal rules and manuals as well as the provision of employee training and awareness-raising activities, with a focus on taking preventive measures against risks identified within the Group relating to leakages of confidential information and compliance with the Personal Information Protection Act, which came into full effect in April 2005.



# Human Resources Management

Sumitomo Corporation is actively implementing various HR initiatives to recruit, retain, develop and utilize capable talent in a strategic and well-planned manner, who can contribute broadly to society and create new value over the medium and long term with a good understanding of the Sumitomo Corporation Group's Management Principles and Activity Guidelines and the practice of SC VALUES\*.

## Strengthening Human Resources Management on a Company-wide Level

To ensure the sustainable growth of the Sumitomo Corporation Group, it is vital to strengthen our recruitment and development of global talent in a strategic and well-planned manner from a medium- and long-term perspective, pursuing human resources strategies in line with business strategies. Under the new medium-term management plan "f(x)," we aim to achieve "cross-boundary growth," the growth together with all our partners across regional, generational, and organizational boundaries, while carrying on with the basic policy and various initiatives adopted under the previous medium-term management plan "FOCUS'10."

### Strengthening our recruitment and development of global talent

#### ■ Strategic development and placement of key staff in each overseas office

Sumitomo Corporation is making the best effort to train locally hired employees in overseas offices and group companies and assign them to play more important roles as a proactive response in global business operations. As part of these efforts, we are conducting training programs for locally hired employees at different career levels (staff in charge, managers and senior executives). At the training programs, more than 200 participants per annum from all over the world come to the Head Office in Tokyo, Japan, to share the corporate DNA that runs through the Sumitomo Corporation Group and strengthen their sense of unity as a member of the Group through reaffirming Sumitomo's business philosophy, and the Management Principles of the Group. In addition, information is shared on management direction and strategies, and the participants attend "skill-up" seminars on a variety of themes as well as joint workshops with Head Office employees.



Training for locally hired employees overseas

\* SC VALUES embodies the nine core behaviors based on our Management Principles and Activity Guidelines expected of all members of the Sumitomo Corporation Group.

## SC VALUES

### 1. Integrity and Sound Management

To comply with laws and regulations, while maintaining the highest ethical standards.

### 2. Integrated Corporate Strength

To create no boundaries within the organization; always to act with a company-wide perspective.

### 3. Vision

To create a clear vision of the future, and to communicate to share it within the organization.

### 4. Change and Innovation

To accept and integrate diversity in values and behavior, and to embrace change as an opportunity for action.

### 5. Commitment

To initiate, own, and achieve organizational objectives.

### 6. Enthusiasm

To act with enthusiasm and confidence, and to motivate others through such action.

### 7. Speed

To make quick decisions and act promptly.

### 8. Human Development

To fully support the development of others' potential.

### 9. Professionalism

To achieve and maintain high levels of expertise and skills.

#### ■ Development of the infrastructure for global HR management Global HR Database

We plan to make the profile of our human resources more visible by establishing a database which contains the individual personnel development plan in order to identify and share information on key personnel at Head Office and overseas organizations. Our efforts will be focused on development of infrastructure for strategic allocation of Head Office employees and locally hired employees across regions and organizations on a global basis.



Image of training center

### Global HRD Center

We are scheduled to complete a new training center in the Ginza, Tokyo, in 2012. The new training center will serve as a training center to develop global talent and as a strategic multi-purpose facility. As a training center, we will use this center to strengthen our human resources development across the entire Group worldwide and to encourage our diversified human resources management. The facility will also provide a

multi-purpose and versatile space, supplementing Head Office functions. In this center, we expect to see our global colleagues from around the world, irrespective of organization or country, meeting for intensive discussions on the future visions and strategies of our Group.

### Conducting strategic placement of human resources on a company-wide level

At Sumitomo Corporation, under the company's overriding principles of autonomous management and self-responsibility, each business unit implements its own strategic human resources management. Business unit also conduct their own staff training and education in order to ensure their medium and long term strategic human resources' needs will be fully satisfied. Under the "f(x)," we carry on what we have done and we conduct strategic placement of human resources across business units on a company-wide level.

#### ■ Further development of cross-organizational personnel

##### Job rotation training

We have introduced job rotation training between Business Units and Corporate Group to allow our employees to have not only on-site experience but also a company-wide perspective, as well as management's point of view. Under the "f(x)," we also promote job rotation training across Business Units to develop our talent capable of leading cross-industrial businesses and managing business subsidiaries. We aim to increase the diversity of our human resources with broad experiences and different values.

##### Human Resources Development Fund

In fiscal year 2010, a new internal fund for human resources development was established to facilitate the effort to ensure and develop enough talent required to achieve the medium- and long-term growth strategies of business units and divisions. The fund is effectively used for sending trainees to overseas offices to develop our global talent in a strategic and well-planned manner. In particular, we increased the number of language trainees of Chinese, Russian, Spanish, Portuguese, etc., to grasp the expanding business opportunities in the emerging market, which will become

important management issues of our Group in the future. Furthermore, we also plan to invest aggressively in human resources development from a medium- and long-term perspective and send employees who are primarily in managerial positions to overseas short-term executive programs to acquire the latest management literacy and build a network with global executives, as well as send locally hired employees of overseas offices to the Head Office.

### Sumisho Business College (SBC)

Sumisho Business College (SBC), a corporate university, offers around 300 courses a year. For instance, visiting the Besshi Copper Mine, the origin of the Sumitomo Corporation Group, has been conducted with the aim of providing participants with an opportunity to realize Sumitomo's business philosophy, which inspired the Sumitomo Corporation Group's present-day Management Principles. Through a variety of programs provided by SBC, our employees can learn basic knowledge and skills required in common, advanced specific expertise and also develop their leadership. The concept behind SBC is that the growth opportunity is "something to take by oneself" instead of "something to be given." Under this concept, we intend to further upgrade and extend these programs as a system to support our good talent who are able to think and act on their own, and deliver results.



Visit to the Besshi Copper Mine



Executive Management Program

#### ■ Enhancement of long-term HR development & placement plan

##### Diversified recruitment sources and strategic reallocation based on HR analysis

We intend to promote reallocation of our human resources at the company-wide level, including recruitment and job rotations among business units, based on the business strategies at each organization. From the standpoint of recruitment, we will seek to diversify our recruitment sources, including in collaboration with our regional organizations and subsidiaries, in addition to increasing the hiring of new graduates and mid-career recruits in Japan. We will also promote personnel development and placement at each organization by implementing succession planning for key posts such as general managers, while reorganizing human resources data to facilitate the assignment of the right person to the right position.

# Contributions to Sustainable Development

“Sumitomo’s business philosophy” is expressed in the following credo: “Benefit for self and others, private and public interests are one and the same.” This means that “Sumitomo’s business activities must benefit not only Sumitomo’s own businesses, but also society and the nation.” This approach of seeing corporate activities within the scope of relationships with society is identical to what is referred to as CSR (Corporate Social Responsibility) today. Sumitomo’s business philosophy, as described above, is illustrated in clauses in the Management Principles of the Sumitomo Corporation Group such as “To create new value, and contribute broadly to society,” and “To achieve prosperity and realize dreams through sound business activities,” and it has become deeply rooted as the universal and unchanging basis of our business activities.

## How We See CSR at the Sumitomo Corporation Group

At the preamble to the Sumitomo Corporation Group Management Principles, the corporate vision of the group is described by the following: “We aim to be a global organization that constantly stays a step ahead in dealing with change, creates new value, and contributes broadly to society.” For us then, promoting CSR means conducting responsible business activities based on our corporate vision, which is also the same as implementing the Group’s Management Principles. We work on social issues from the standpoint of a corporation while building better relationships with stakeholders through sound business activities and social contribution activities, with the aim of building a sustainable society. For us, this means achieving prosperity and realizing the dreams of all our stakeholders, and we recognize this as the fundamental basis of CSR.

## Initiatives for the United Nations Global Compact

The Sumitomo Corporation Group supports the 10 principles of the UN Global Compact (GC), an international CSR-related initiative that proposes values held in common with the Group’s Management Principles. We are committed to enhancing our corporate value by clearly identifying areas of improvement in our business activities in light of the values advocated by the 10 principles.

### The Global Compact’s 10 Principles



#### Human Rights

1. Businesses should support and respect the protection of internationally proclaimed human rights; and
2. make sure that they are not complicit in human rights abuses.

#### Labour Standards

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. the elimination of all forms of forced and compulsory labour;
5. the effective abolition of child labour; and
6. the elimination of discrimination in respect of employment and occupation.

#### Environment

7. Businesses should support a precautionary approach to environmental challenges;
8. undertake initiatives to promote greater environmental responsibility; and
9. encourage the development and diffusion of environmentally friendly technologies.

#### Anti-Corruption

10. Businesses should work against corruption in all its forms, including extortion and bribery.

\* We also support the Global Human Rights Declaration, which the 10 principles of the UN Global Compact comply with.

## ➔ Report on Responsibility & Sustainability

For details on our CSR activities, please refer to our Report on Responsibility & Sustainability. The report is available on our website: <http://www.sumitomocorp.co.jp/english/society/report.html>

## Initiatives for the Supply Chain CSR

The Sumitomo Corporation Group set down the CSR (Corporate Social Responsibility) Action Guidelines for Supply Chains, in November 2009. By implementing these guidelines, which are based on our Management Principles, we are aiming to achieve a sustainable and better society by working together with our suppliers and business partners in order to create new values while at the same time fulfilling our social responsibilities in such areas as strict compliance with laws and regulations, respect for human rights, and protection of the environment.

### The Sumitomo Corporation Group CSR Action Guidelines for Supply Chains

(November 2009)

The Sumitomo Corporation Group aims to be a global organization that constantly stays a step ahead in dealing with change, creates new value and contributes broadly to society. In its Management Principles, the Group sets forth its mission to achieve prosperity and realize dreams through sound business activities, and to strictly adhere to a management style which places prime importance on integrity and sound management with utmost respect for the individual.

In line with its Management Principles, the Sumitomo Corporation Group hereby sets down the CSR (Corporate Social Responsibility) Action Guidelines for Supply Chains, aiming to achieve a sustainable and better society. With a view to further strengthening “global relations”—one of the elements of the business foundation that supports our integrated corporate strength, which is our core competence—we will request our suppliers and business partners to kindly accept, understand and practice these guidelines so that together we can fulfill our social responsibilities in the value chain in which we are jointly involved.

Our suppliers and business partners are expected:

1. To respect the human rights of employees and never treat employees in an inhumane manner
2. To prevent forced labor, child labor and unreasonably cheap labor
3. Not to practice discrimination with respect to employment
4. To respect the rights of employees to associate freely in order to ensure smooth negotiation between labor and management
5. To strive to provide employees with a safe and healthy work environment
6. To strive to protect the global environment
7. To ensure the quality and safety of products and services
8. To ensure fair transactions, abiding by all applicable laws, rules and regulations, and to prevent all types of corruption, including extortion and bribery
9. To disclose information regarding the above in a timely and appropriate manner

## Global Safety Management

The Sumitomo Corporation Group puts “safety first” in its business activities. Endeavoring to better prepare for and prevent incidents, accidents and disasters in Japan and overseas, we regularly conduct educational activities and upgrade our safety planning infrastructure. Through these means, we work diligently to ensure that all executives and employees maintain a deep awareness of crisis situations, understand all appropriate safety guidelines and measures and put them into practice.

As a part of the aforementioned endeavors, we are striving to realize “zero” workplace accidents at subsidiaries and associated companies engaged in manufacturing, processing and warehouse activities. A Safety Management Committee has been established at each Business Unit. These committees take action to ensure safety management and prevent workplace accidents together with Group subsidiaries and associated companies in Japan and overseas.

### Measures to Improve Safety Awareness and Prevent Accidents

In the Metal Products Business Unit, all subsidiaries and associated companies document their safety activities in accordance with the Group’s *Safety Manual*, *Safety and Hygiene Management Guidelines*, and *Work handbooks*, and every employee is appropriately trained on safety in the workplace. This vigilance helps prevent accidents before they happen.

In the Tubular Products Group’s Supply Chain Management operations worldwide, the employees of the Group companies, customers and subcontractors work together to conduct safety management in order to create safe work environments and procedures designed to minimize the risk of accidents for all involved. We also strive on a daily basis to continuously raise safety awareness among Sumitomo employees and our contractors.

In fiscal 2010, we completed the risk assessments and established management programs for the coating, storage and transportation of 100,000 tons of large diameter line pipe in Dunkerque, France. We have also worked on the improvement of our Global HSE Management System. This included the upgrading of procedures and reduction of the risks associated with offloading the products from the vessels in Floro, Norway, and the significant improvement of HSE performance in

Dampier, Australia. Upgrades to our web-based HSE Portal have resulted in improved reporting, analysis and sharing of information across our global operations.



Workers wearing personal protective equipment and individual safety harnesses during vessel unloading operations—Floro, Norway

## Initiatives for the Environment

The Sumitomo Corporation Group recognizes that environmental issues are global in scale, and are long-term matters that will affect future generations. As a global organization, the Group has established an environmental policy of striving to achieve sustainable development, by way of sound business activities, aimed at symbiosis between social and economic progress and environmental preservation.

### Case in Point: Shaping a Greener Future by Promoting and Popularizing Solar Power Generation

In April 2010, Sumitomo Corporation consolidated operations in the environment and new energy field into the newly established New Business Development & Promotion Division. Under the new division, the Company set up the Solar Business Department and positioned the solar power generation business as a core environmental business.

In the Solar Business Department, Sumitomo Corporation has an extensive value chain ranging from the procurement of raw materials needed to produce solar panels to solar panel sales and operation of solar power generation projects. Notably in the latter field, Sumitomo Corporation constructed a solar power generation project with a total generation capacity of 12.6MW in 2008 on Tenerife, one of the Canary Islands of Spain. These islands receive the greatest amount of sunshine in all of Europe. This project has given Sumitomo Corporation considerable experience and knowledge in the solar power project field.

In February 2011, Sumitomo Corporation invested in a solar power generation project with a total generation capacity of 9.7MW in the Puglia region of southern Italy. The Company is operating the project as its largest shareholder. In France, Sumitomo Corporation, together with a local partner, participated in a solar power generation project with a total generation capacity of 31MW in the city of Les Mées on the outskirts of Marseilles in southern France. Sumitomo Corporation became the first Japanese company to launch such a project in France. Construction work is now steadily under way with the view to commencing operations this autumn. Each of these projects is blessed with ideal geographical conditions, and there are high hopes for each to contribute to society over the long term as a stable source of electricity with a low environmental impact.

Going forward, the Group will continue to promote solar power generation in various locations worldwide, while looking to utilize wind, geothermal, biomass and other sources of renewable energy in accordance with geographical conditions, as it works to help shape a greener future through the businesses related to multifarious power infrastructure that helps to achieve a low-carbon society.



Solar power generation project on the island of Tenerife, Spain



Solar power generation project in the city of Les Mées in southern France



## Initiatives for Social Contribution

The Sumitomo Corporation Group is engaged in social contribution activities aimed at developing the next generation of human resources who will drive the sustainable development of society, and contributing to local communities in areas we do business all over the world. We also take part in various activities as a corporate citizen.

### Case in Point: Lectures Bearing the Sumitomo Corporation Name Provided in Four Universities in China and Vietnam

To support leadership development of the next generation in China and Vietnam, Sumitomo Corporation started offering lectures bearing its name in 2006 at Nankai University (Tianjin) and Tsinghua University (Beijing) in China and Hanoi National Economics University in Vietnam. At the request of the Foreign Trade University in Hanoi, Vietnam, Sumitomo Corporation began holding lectures at this university starting this year.

With a unique theme—“Corporate Social Responsibility,” “Global Leadership” and “Management of Global Corporations”—for each university, the courses are all designed to develop future leaders of China and Vietnam. Sumitomo Corporation works in cooperation with the universities to plan and run these courses. The courses have proven popular among students and have received high marks from all quarters, including the Tianjin city government, which said: “This program greatly contributes to human resources development and globalization within the region.”

At Tsinghua University, which marked its founding centennial in April 2011, the Sumitomo Corporation President and CEO gave a commemorative address titled “Leadership in the Management of Integrated Trading Company in the Ever-changing Global Economy.” This address was part of a series of commemorative events marking the university’s founding centennial. The venue was very lively. On the day of the lecture, the auditorium was filled to its capacity of 200 people, and some students stood in the back to hear the address. In the Q&A session afterwards, Mr. Kato was unable to answer all the questions with so many audience members raising their hands. Intensive discussions were held with very dedicated and enthusiastic students.

Through these lectures, we strongly hope that numerous Chinese and Vietnamese students will develop a stronger understanding of Japanese companies and businesses and build strong economic ties with Japan as they pursue their careers. Staying true to these aspirations, we will continue to offer these courses going forward.



Commemorative address by President and CEO of Sumitomo Corporation, at Tsinghua University (China)



A student asks a question after a lecture at Hanoi National Economics University (Vietnam)

# Directors and Corporate Auditors

(As of July 1, 2011)



**Shunichi Arai**  
Executive Vice President

**Susumu Kato**  
President and CEO

**Kazuo Ohmori**  
Executive Vice President

**Motoyuki Oka**  
Chairman of the Board of Directors

**Takahiro Moriyama**  
Executive Vice President

## Directors and Corporate Auditors

Chairman of the Board of Directors

**Motoyuki Oka**

President and CEO  
**Susumu Kato**

Director

**Kazuo Ohmori**

Director

**Shunichi Arai**

Director

**Takahiro Moriyama**

Director

**Toyosaku Hamada**

Director

**Kuniharu Nakamura**

Director

**Shinichi Sasaki**

Director

**Takuro Kawahara**

Director

**Yoshio Osawa**

Director

**Yasuyuki Abe**

Director

**Masayuki Doi**

Standing Corporate Auditor (Full-Time)

**Kenzo Okubo**

Corporate Auditor (Full-Time)

**Ichiro Miura**

Corporate Auditor (Lawyer)

**Akio Harada\***

Corporate Auditor (Certified Public Accountant)

**Tsuguoki Fujinuma\***

Corporate Auditor (Lawyer)

**Mutsuo Nitta\***

Notes: 1. All Directors are Representative Directors.

2. Outside Corporate Auditors are indicated by an asterisk (\*).

## Executive Officers

### ■ President and CEO

#### Susumu Kato

### ■ Executive Vice Presidents

#### Kazuo Ohmori

General Manager, Transportation & Construction Systems Business Unit

#### Shunichi Arai

General Manager, Metal Products Business Unit

#### Takahiro Moriyama

General Manager, Infrastructure Business Unit

### ■ Senior Managing Executive Officers

#### Kenji Kajiwara

General Manager for China, CEO of Sumitomo Corporation China Group, General Manager, Beijing Office, President of Sumitomo Corporation (China) Holding Ltd.

#### Toyosaku Hamada

CFO, General Manager, Financial Resources Management Group

#### Takashi Kano

General Manager for the Americas, President and CEO of Sumitomo Corporation North America Group, Director & President of Sumitomo Corporation of America

#### Kuniharu Nakamura

General Manager, Mineral Resources, Energy, Chemical & Electronics Business Unit

#### Shinichi Sasaki

General Manager, General Products & Real Estate Business Unit

#### Takuro Kawahara

General Manager, Human Resources, General Affairs & Legal Group

#### Yoshio Osawa

General Manager, Media, Network & Lifestyle Retail Business Unit

#### Yasuyuki Abe

General Manager, New Industry Development & Cross-function Business Unit  
General Manager, Financial Service Division

#### Kazuhisa Togashi

Assistant General Manager, Metal Products Business Unit,  
General Manager, Iron & Steel Division, No. 3

#### Kazuhiro Takeuchi

General Manager for Asia, President and CEO of Sumitomo Corporation Asia Group, Director & President of Sumitomo Corporation Asia Pte. Ltd

### ■ Managing Executive Officers

#### Naoki Hidaka

General Manager, Kansai Regional Business Unit

#### Masayuki Doi

General Manager, Corporate Planning & Coordination Group,  
General Manager, Corporate Planning & Coordination Dept.

#### Toru Furihata

Assistant General Manager, Mineral Resources, Energy, Chemical & Electronics Business Unit,  
General Manager, Mineral Resources Division No. 2

#### Hiroyuki Inohara

Assistant General Manager, Financial Resources Management Group,  
General Manager, Finance Dept.

#### Masaru Nakamura

General Manager for Europe, CEO of Sumitomo Corporation Europe Group,  
Director & President of Sumitomo Corporation Europe Holding Limited, Chairman, Director & President of Sumitomo Corporation Europe Limited

#### Makoto Nakamura

General Manager, Internal Auditing Dept.

#### Kohei Hirao

Assistant General Manager, Infrastructure Business Unit,  
General Manager, Telecommunication, Environment & Industrial Infrastructure Business Division

#### Michihiko Kanegae

Assistant General Manager, Infrastructure Business Unit,  
General Manager, Global Power Infrastructure Business Division

#### Kiyomi Machida

General Manager, Chubu Regional Business Unit

#### Hideki Iwasawa

Assistant General Manager, Financial Resources Management Group,  
General Manager, Corporate Risk Management Dept.

### ■ Executive Officers

#### Akira Takeuchi

General Manager, Mineral Resources Division No. 1

#### Koichi Takahata

General Manager, Accounting Controlling Dept.

#### Nobuhiko Yuki

General Manager, Life Science Division

#### Kiyoshi Ogawa

General Manager, Legal Dept.

#### Hiroaki Mizobuchi

General Manager, New Business Development & Promotion Division

#### Masao Sekiuchi

General Manager, Non-Ferrous Products & Metals Division

#### Masato Sugimori

Executive Vice President and CFO of Sumitomo Corporation North America Group,  
Executive Vice President and CFO of Sumitomo Corporation of America, Assistant General Manager for the Americas

#### Yutaka Sekine

General Manager, Planning & Administration Dept., Transportation & Construction Systems Business Unit

#### Masahiro Fujita

Assistant General Manager, Corporate Planning & Coordination Group

#### Yoshihiro Fujiura

Assistant General Manager for China, General Manager, Transportation & Construction Systems, Infrastructure Business Unit of Sumitomo Corporation China Group, President of Sumitomo Corporation (Hong Kong) Ltd.

#### Akira Satake

General Manager, Planning & Administration Dept., Mineral Resources, Energy, Chemical & Electronics Business Unit

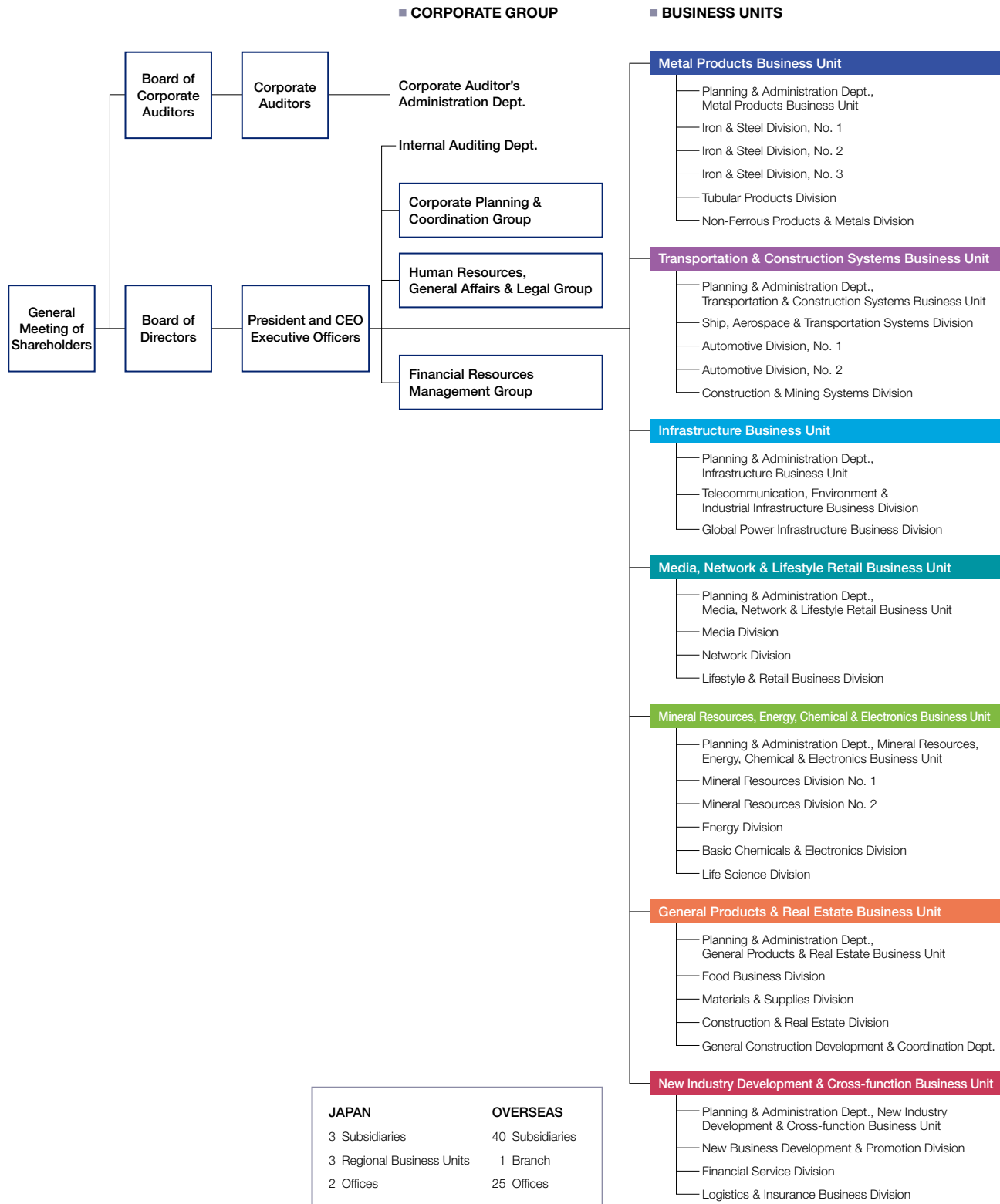
#### Toshifumi Shibuya

General Manager, Planning & Administration Dept., Media, Network & Lifestyle Retail Business Unit

# BUSINESS OPERATING STRUCTURE

## Organization

(As of July 1, 2011)



### ■ BUSINESS UNITS

- Metal Products Business Unit**
  - Planning & Administration Dept., Metal Products Business Unit
  - Iron & Steel Division, No. 1
  - Iron & Steel Division, No. 2
  - Iron & Steel Division, No. 3
  - Tubular Products Division
  - Non-Ferrous Products & Metals Division

- Transportation & Construction Systems Business Unit**
  - Planning & Administration Dept., Transportation & Construction Systems Business Unit
  - Ship, Aerospace & Transportation Systems Division
  - Automotive Division, No. 1
  - Automotive Division, No. 2
  - Construction & Mining Systems Division

- Infrastructure Business Unit**
  - Planning & Administration Dept., Infrastructure Business Unit
  - Telecommunication, Environment & Industrial Infrastructure Business Division
  - Global Power Infrastructure Business Division

- Media, Network & Lifestyle Retail Business Unit**
  - Planning & Administration Dept., Media, Network & Lifestyle Retail Business Unit
  - Media Division
  - Network Division
  - Lifestyle & Retail Business Division

- Mineral Resources, Energy, Chemical & Electronics Business Unit**
  - Planning & Administration Dept., Mineral Resources, Energy, Chemical & Electronics Business Unit
  - Mineral Resources Division No. 1
  - Mineral Resources Division No. 2
  - Energy Division
  - Basic Chemicals & Electronics Division
  - Life Science Division

- General Products & Real Estate Business Unit**
  - Planning & Administration Dept., General Products & Real Estate Business Unit
  - Food Business Division
  - Materials & Supplies Division
  - Construction & Real Estate Division
  - General Construction Development & Coordination Dept.

- New Industry Development & Cross-function Business Unit**
  - Planning & Administration Dept., New Industry Development & Cross-function Business Unit
  - New Business Development & Promotion Division
  - Financial Service Division
  - Logistics & Insurance Business Division

JAPAN	OVERSEAS
3 Subsidiaries	40 Subsidiaries
3 Regional Business Units	1 Branch
2 Offices	25 Offices

# Regional Business Units and Subsidiaries

(As of July 1, 2011)

Region	Name of Regional Business Unit or Subsidiary	Location
<b>Japan</b>	Kansai Regional Business Unit	Osaka
	Chubu Regional Business Unit	Nagoya
	Kyushu-Okinawa Regional Business Unit/ Sumitomo Corporation Kyushu Co., Ltd.	Fukuoka
	Sumitomo Corporation Hokkaido Co., Ltd.	Sapporo
	Sumitomo Corporation Tohoku Co., Ltd.	Sendai
<b>Asia</b>	Sumitomo Corporation (China) Holding Ltd.	Beijing
	Sumitomo Corporation (China) Limited	Beijing
	Sumitomo Corporation (Shanghai) Limited	Shanghai
	Sumitomo Corporation (Tianjin) Ltd.	Tianjin
	Sumitomo Corporation (Dalian) Ltd.	Dalian
	Sumitomo Corporation (Qingdao) Ltd.	Qingdao
	Sumitomo Corporation (Guangzhou) Ltd.	Guangzhou
	Shenzhen Sumitomo Corporation Ltd.	Shenzhen
	Sumitomo Corporation (Hong Kong) Limited	Hong Kong
	Sumitomo Corporation Taiwan Ltd.	Taipei
	Sumitomo Corporation Korea Ltd.	Seoul
	Sumitomo Corporation Asia Pte. Ltd.	Singapore
	Sumitomo Corporation Thailand, Ltd.	Bangkok
	Sumi-Thai International Limited	
	Sumur Cahaya Sdn. Bhd.	Kuala Lumpur
Sumitomo Corporation of the Philippines	Manila	
PT. Sumitomo Indonesia	Jakarta	
Sumitomo Corporation Vietnam LLC	Hanoi	
Sumitomo Corporation India Private Limited	New Delhi	
<b>Oceania</b>	Sumitomo Australia Pty Ltd	Sydney
<b>The Middle East</b>	Sumitomo Corporation Middle East FZE	Dubai
	Sumitomo Corporation Iran, Ltd.	Teheran
	Sumitomo Corporation Dis Ticaret A.S.	Istanbul
<b>Europe and CIS</b>	Sumitomo Corporation (Central Eurasia) LLC	Moscow
	Sumitomo Corporation Europe Holding Limited	London
	Sumitomo Corporation Europe Limited	London
	Sumitomo Corporation Italia S.p.A.	Milan
	Sumitomo Corporation España S.A.	Madrid
	Sumitomo Deutschland GmbH	Dusseldorf
	Sumitomo France S.A.S.	Paris
Sumitomo Benelux S.A./N.V.	Brussels	
<b>North America</b>	Sumitomo Canada Limited	Calgary
	Sumitomo Corporation of America	New York
<b>Central America and South America</b>	Sumitomo Corporation de Mexico S.A. de C.V.	Mexico City
	Sumitomo Corporation del Ecuador S.A.	Quito
	Sumitomo Corporation de Venezuela, S.A.	Caracas
	Sumitomo Corporation Colombia S.A.	Bogota
	Sumitomo Corporation del Peru S.A.	Lima
	Sumitomo Corporation Argentina S.A.	Buenos Aires
	Sumitomo Corporation (Chile) Limitada	Santiago
Sumitomo Corporation do Brasil S.A.	Sao Paulo	

# Global Network

(As of July 1, 2011)



## EUROPE AND CIS

London  
Aberdeen  
Oslo  
Prague  
Warsaw  
Milan  
Madrid  
Dusseldorf  
Paris  
Brussels  
Moscow  
Vladivostok  
St. Petersburg  
Kiev  
Almaty  
Astana  
Tashkent

## AFRICA

Algiers  
Casablanca  
Johannesburg  
Nairobi  
Luanda  
Antananarivo  
Accra

## MIDDLE EAST

Dubai  
Teheran  
Istanbul  
Ankara  
Abu Dhabi  
Muscat  
Baghdad  
Doha  
Bahrain  
Kuwait  
Riyadh  
Jeddah  
Alkhobar  
Sanaa  
Cairo  
Amman  
Damascus  
Tripoli

## OCEANIA

Sydney  
Melbourne  
Perth  
Auckland

## Overseas: 64 countries

40 Subsidiaries / 88 locations  
1 Branch / 1 location  
25 Offices / 25 locations

**Total 114 locations**

## Japan:

Headquarters  
3 Subsidiaries / 9 locations  
3 Regional Business Units / 12 locations  
2 Offices / 2 locations

**Total 24 locations**



**ASIA**

- |             |                  |
|-------------|------------------|
| Beijing     | Singapore        |
| Chengdu     | Kuala Lumpur     |
| Changchun   | Phnom Penh       |
| Shanghai    | Vientiane        |
| Nanjing     | Yangon           |
| Suzhou      | Dhaka            |
| Tianjin     | Karachi          |
| Dalian      | Islamabad        |
| Shenyang    | Bangkok          |
| Qingdao     | Manila           |
| Guangzhou   | Jakarta          |
| Shenzhen    | Surabaya         |
| Hong Kong   | Hanoi            |
| Ulaanbaatar | Ho Chi Minh City |
| Taipei      | Danang           |
| Kaohsiung   | New Delhi        |
| Seoul       | Mumbai           |
| Busan       | Chennai          |

**NORTH AMERICA**

- Calgary
- Toronto
- Vancouver
- Montreal
- New York
- Detroit
- Pittsburgh
- Washington, D.C.
- Chicago
- Houston
- Denver
- Portland
- Los Angeles

**CENTRAL AMERICA AND SOUTH AMERICA**

- Mexico City
- Monterrey
- Guatemala
- Havana
- Quito
- Caracas
- Bogota
- Lima
- Buenos Aires
- Santiago
- Sao Paulo
- Rio de Janeiro
- Porto Alegre
- Recife

**JAPAN**

- |           |             |
|-----------|-------------|
| Tokyo     | Hiroshima   |
| Sapporo   | Imabari     |
| Muroran   | Takamatsu   |
| Sendai    | Niihama     |
| Niigata   | Kita-Kyushu |
| Shizuoka  | Fukuoka     |
| Hamamatsu | Nagasaki    |
| Nagoya    | Kagoshima   |
| Osaka     | Naha        |
| Kobe      |             |

# Principal Subsidiaries and Associated Companies

(As of March 31, 2011)

	Subsidiary/ Associated Company	Main Business	
<b>Metal Products Business Unit</b>			
<b>Japan</b>	Alcut Co., Ltd.	Sub. Shearing, slitting, and blanking of aluminum coils, sheets, and circles	
	Hokkaido Shearing Kaisha, Ltd.	Sub. Fabrication and sale of steel products	
	Ishihara Kohtetu Co., Ltd.	Sub. Stock, sale, and processing of tool steel	
	KS Summit Steel Co., Ltd.	Sub. Steel service center (processing and sale of steel sheets)	
	Mazda Steel Co., Ltd.	Sub. Shearing, slitting, and blanking of steel sheets	
	SC Pipe Solutions Co., Ltd.	Sub. Sale of steel piping and other steel products	
	SC Tubulars Co., Ltd.	Sub. Sale of specialty tubular products	
	Sofuku-koki Co., Ltd.	Sub. Manufacture and sale of steel racks	
	Sumisho Metalex Corporation	Sub. Sale of non-ferrous metal products, materials for home heat solution	
	Sumisho Speciality Steel Corporation	Sub. Stock, sale, and processing of specialty steel	
	Sumisho Tekko Hanbai Co., Ltd.	Sub. Sale of steel products	
	Summit Showa Aluminum Ltd.	Sub. Production of aluminum alloy ingots	
	Summit Steel Corporation	Sub. Sale of steel sheets	
	Summit Steel Oita	Sub. Steel service center (processing and sale of steel sheets)	
	Tanimoto Steel Corporation	Sub. Shearing, slitting, and sale of steel plates	
<b>Asia</b>	Dalian Summit Metal Products Co., Ltd. (China)	Sub. Shearing, slitting, and sale of steel plates	
	Dong Guan Summit Metal Products Co., Ltd. (China)	Sub. Shearing, slitting, and sale of steel plates	
	Dong Guan S.Y. Metal Ltd. (China)	Sub. Shearing, slitting, and sale of steel plates	
	Foshan Summit Nikka Mold & Metal Products Co., Ltd. (China)	Sub. Stock, sale, and processing of tool steel	
	Hangzhou Summit Metal Products Co., Ltd. (China)	Sub. Shearing, slitting, and sale of steel plates	
	Shanghai Hi-Tec Metal Products Co., Ltd. (China)	Sub. Manufacture and sale of metal-processing products	
	Shanghai Nikka Metal Products Co., Ltd. (China)	Sub. Stock, sale, and processing of tool steel	
	Shanghai Summit Metal Products Co., Ltd. (China)	Sub. Shearing, slitting, and sale of steel plates	
	Tianjin Hua Zhu Metal Products Co., Ltd. (China)	Sub. Shearing, slitting, and sale of steel plates	
	Wuxi Meifeng Metal Products Co., Ltd. (China)	Sub. Shearing, slitting, and sale of steel plates	
	Zhongshan Nomura Steel Product Co., Ltd. (China)	Sub. Shearing, slitting, and sale of steel plates	
	India Steel Summit Private Limited (India)	Sub. Shearing, slitting of steel plates and manufacture of metal stamping parts and die	
	P.T. Super Steel Indah (Indonesia)	Ass. Shearing, slitting, and sale of steel plates	
	P.T. Super Steel Karawang (Indonesia)	Sub. Shearing, slitting, and sale of steel plates	
	Steel Centre Malaysia Sdn. Bhd. (Malaysia)	Sub. Shearing, slitting, and sale of steel plates	
	Sumiputeh Steel Centre Sdn. Bhd. (Malaysia)	Ass. Shearing, slitting, and sale of steel plates	
	Calamba Steel Center Inc. (Philippines)	Sub. Shearing, slitting, and sale of steel plates	
	Mactan Steel Center Inc. (Philippines)	Sub. Shearing, slitting, and sale of steel plates	
	Asian Steel Company Ltd. (Singapore)	Sub. Shearing, slitting, and sale of steel plates	
	Mason Metal Industry Co., Ltd. (Taiwan)	Sub. Shearing, slitting, and sale of steel plates	
	CS Metal Co., Ltd. (Thailand)	Ass. Shearing, slitting, and sale of steel plates	
	CS Non-Ferrous Center Co., Ltd. (Thailand)	Ass. Shearing, slitting, and sale of non-ferrous metal sheets	
	Sumisho Laser Welding (Thailand) Co., Ltd. (Thailand)	Sub. Manufacturing of metal tailor welded blanks (TWB)	
	Thai Steel Service Center Ltd. (Thailand)	Sub. Shearing, slitting, and sale of steel plates	
	Hanoi Steel Center Co., Ltd. (Vietnam)	Sub. Shearing, slitting, and sale of steel plates	
	Saigon Steel Service & Processing Co. (Vietnam)	Ass. Shearing, slitting, and sale of steel plates	
	<b>The Middle East</b>	Summit Steel (M.E.) FZCO (UAE)	Sub. Trade of various steel products, steel service center, sale of flat steel products
	<b>Europe</b>	Steel Center Europe, S.R.O. (Czech)	Ass. Shearing, slitting, and sale of steel plates
	<b>The Americas</b>	Servilamina Summit Mexicana S.A. de C.V. (Mexico)	Sub. Steel service center (processing and sale of steel sheets)
AB Tube Processing, Inc. (U.S.)		Sub. Tube processing for airbag inflators	
Arkansas Steel Associates LLC (U.S.)		Ass. Steel mini mill (manufacture of railroad tie plates)	
SC Pipe Services Inc. (U.S.)		Sub. Investment in pipe manufacturing and sales company in the U.S.	
	Summit Stainless Steel LLC (U.S.)	Sub. Sales of stainless steel products	
<b>Oceania</b>	SC Metal Pty. Ltd. (Australia)	Sub. Investment in aluminum smelting operation in Australia	



		Subsidiary/ Associated Company	Main Business
<b>Transportation &amp; Construction Systems Business Unit</b>			
<b>Japan</b>	KIRIU Corporation	Sub.	Automotive components manufacturer (disc rotors, brake drums, etc.)
	Oshima Shipbuilding Co., Ltd.	Ass.	Shipbuilding
	SC-ABeam Automotive Consulting	Sub.	Automotive industry focused consulting
	SC Automotive Investment	Sub.	Automotive related investment fund operation and management
	Sumisho Aero-Systems Corporation	Sub.	Sale of aerospace equipment
	Sumisho Machinery Trade Corporation	Sub.	Trading of machinery, equipment and automobiles
	Sumisho Marine Co., Ltd.	Sub.	Ship related operational services
	Sumisho Rental Support Corporation	Sub.	Rental of aerial work platforms, temporary housing house, hydraulic excavator, attachment, etc.
	Sumitomo Mitsui Auto Service Company, Limited	Sub.	Leasing of motor vehicles
<b>Asia</b>	Chongqing Sumisho Yunxin Logistics Co., Ltd. (China)	Sub.	Logistics service and light assembly for automotive components
	SC Construction Machinery (Shanghai) Corporation (China)	Sub.	Sale, rental, other services of construction equipment
	Shanghai Baosteel Summit Auto Trading Co., Ltd. (China)	Ass.	Dealership of motor vehicles
	Kubota Agricultural Machinery India Private Ltd. (India)	Ass.	Sale of tractors, combines, and rice transplanters in India
	SML Isuzu Limited (India)	Sub.	Commercial vehicle manufacturer
	P.T. Oto Multiartha (Indonesia)	Sub.	Financing of automobiles
	P.T. Summit Oto Finance (Indonesia)	Sub.	Financing of motorcycles
	P.T. Traktor Nusantara (Indonesia)	Ass.	Forklift hire/rental, and sale/service for forklift, farm tractor and industrial equipment
	Sumisho Motor Finance Corporation (Philippines)	Ass.	Financing of motorcycles
	Summit Auto Management (Thailand)	Sub.	Holding and management company of automotive dealership and finance companies
	Summit Capital Leasing Co., Ltd. (Thailand)	Sub.	Financing of motorcycles
	Toyota Can Tho Company Ltd. (Vietnam)	Ass.	Dealership of Toyota motor vehicles
	Toyota Giai Phong Company (Vietnam)	Ass.	Dealership of Toyota motor vehicles
	Toyota Ly Thuong Kiet (Vietnam)	Sub.	Dealership of Toyota motor vehicles
<b>The Middle East</b>	Summit Auto Trade Facilities (Jordan)	Sub.	Financing of motor vehicles
	Nissan Otomotiv A.S. (Turkey)	Sub.	Import and wholesale of Nissan motor vehicles and parts
<b>Europe</b>	Sumitec International, Ltd. (Russia)	Sub.	Sale and aftersales service of construction, mining and material handling equipment
	Summit Motors (Vladivostok) (Russia)	Sub.	Import and sale of Toyota motor vehicles and parts
	Tecnosumit (Tecnologia para La Construcción y Minería S.L.) (Spain)	Sub.	Holding and management company of Komatsu distributors and other business in Europe
	Toyota Canarias, S.A. (Canary Islands, Spain)	Sub.	Import and wholesale of Toyota and Lexus motor vehicles and parts
	LLC Summit Motors Ukraine (Ukraine)	Sub.	Dealership of Toyota and Lexus motor vehicles
	Toyota Ukraine (Ukraine)	Sub.	Import and wholesale of Toyota and Lexus motor vehicles and parts
<b>The Americas</b>	SMS Construction and Mining Systems Inc. (Canada)	Sub.	Holding and management company of Komatsu distributor and other business
	SMS Equipment Inc. (Canada)	Sub.	Operates dealership of Komatsu construction, mining machinery, and others
	Plaza Motors Corporation (Puerto Rico)	Sub.	Import and sale of Mazda motor vehicles
	Linder Industrial Machinery Company (U.S.)	Sub.	Operates dealership of Komatsu construction equipment and others
	SMS International Corporation (U.S.)	Sub.	Holding and management company of Komatsu distributor and other business
	Summit Motor Management, Inc. (U.S.)	Sub.	Holding and management company of automotive dealerships
<b>Oceania</b>	Summit Auto Lease Australia Pty Limited (Australia)	Sub.	Motor vehicle leasing to corporate customers
<b>Africa</b>	Toyota Libya FZC (Libya)	Sub.	Import and sale of Toyota motor vehicles and parts

		Subsidiary/ Associated Company	Main Business
<b>Infrastructure Business Unit</b>			
<b>Japan</b>	Inamoto Manufacturing Co., Ltd.	Sub.	Manufacture and sale of industrial washing machines
	SC Hiroshima Energy Corporation	Sub.	Electricity and Steam Supply for Elpida Memory, Inc. (Energy Service Provider)
	Sumisho Inax Corporation	Sub.	Sale and maintenance of industrial washing machines
	Sumisho Machinery Trade Corporation	Sub.	Trading of machinery, equipment and automobiles in Japan
	Sumitomo Shoji Machinex Co., Ltd.	Sub.	Sale of machinery and equipment
	Summit Energy Corporation	Sub.	Planning, development and operation of business in electric power and energy field
	Summit Power Holdings Limited	Sub.	Planning, development and operation of electric power
	<b>Asia</b>	MobiCom Corporation (Mongolia)	Ass.
Mekong Energy Company Ltd. (Vietnam)		Ass.	Power generation and supply of electricity in Vietnam
<b>The Middle East</b>	Hidd Power Company (Bahrain)	Ass.	Power generation and sea water desalination project company in Bahrain
	Shuweihat CMS International Power Company PJSC (UAE)	Ass.	Power generation and sea water desalination project company in the UAE
<b>Europe</b>	CBK Netherlands Holdings B.V. (Netherlands)	Ass.	Holding company of CBK Power Company Ltd, which operates hydraulic power plant in the Philippines
<b>The Americas</b>	Perennial Power Holdings Inc. (U.S.)	Sub.	Development, ownership and management of power plant in the U.S.
	Summit Wind Power Texas, Inc. (U.S.)	Sub.	Development, ownership and management of wind-power plant in the U.S.
<b>Oceania</b>	Summit Southern Cross Power Pty. Ltd. (Australia)	Sub.	Development, ownership and management of power plant in Australia

<b>Media, Network &amp; Lifestyle Retail Business Unit</b>			
<b>Japan</b>	Asmik Ace Entertainment Inc.	Sub.	Production, distribution and sale of movies and videos
	Barneys Japan Co., Ltd.	Sub.	Import and sale of apparel, accessories, cosmetics, and goods
	CSK CORPORATION (from April 2011)	Sub.	System development, IT management and BPO (Business Process Outsourcing)
	EWEL, Inc. (from April 2011)	Ass.	Corporate benefits administration outsourcing
	JBS Limited	Sub.	Program play-out and relay services for TV channel operators
	Jupiter Shop Channel Co., Ltd.	Sub.	Operation of TV shopping channel
	Jupiter Telecommunications Co., Ltd.	Ass.	Operation of multiple cable TV systems (MSO) and channels (MCO)
	LANCEL JAPAN LIMITED	Sub.	Sole import and sale of bags and accessories, "LANCEL"
	Mammy Mart Corporation	Ass.	Supermarket chain
	MARC JACOBS JAPAN K.K.	Ass.	Import and sale of bags, apparel and accessories, "MARC JACOBS" and "MARC BY MARC JACOBS"
	Montrive Corporation	Sub.	Sole import, designing and sale of the luxury line of chenille fabrics, "FEILER"
	Naracamicie Co., Ltd.	Sub.	Sale, import and design of women's apparel and accessories, "NARA CAMICIE"
	Nissho Electronics Corporation	Ass.	Sale and support of computer software and hardware; system integration
	SC NETSUPER CORP.	Sub.	Online grocery shopping service
	Soukai Drug Co., Ltd.	Sub.	Internet drugstore
	Sumisho Computer Systems Corporation	Sub.	System integration; data processing services; development and sale of computer software and hardware
	Sumisho Drugstores Inc.	Sub.	Drugstore chain
	Sumisho Interior International Inc.	Sub.	Space and interior designing and installation, import, export and sale of consumer goods, such as furniture and carpet for residential and contract use
	Sumitex International Co., Ltd	Sub.	Production and sale of textile products and materials
	Summit, Inc.	Sub.	Supermarket chain
	T-Gaia Corporation	Ass.	Sale of cellular phones and fixed line telecommunication services
	United Cinemas Co., Ltd.	Sub.	Development and operation of multiplex cinema theaters
	WAMINET Japan K.K.	Sub.	Data transfer and storage services for video, music and image sources

		Subsidiary/ Associated Company	Main Business
<b>Mineral Resources, Energy, Chemical &amp; Electronics Business Unit</b>			
<b>Japan</b>	Enessance Holdings Co., Ltd.	Ass.	Planning strategy of LPG & home solution business, controlling its subsidiaries, and LPG wholesale
	LNG Japan Corporation	Ass.	Trading of LNG, investment and financing related to LNG business
	Nippon Power Graphite Co., Ltd	Ass.	Manufacture and sale of lithium-ion battery anode material
	Nusa Tenggara Mining Corporation	Sub.	Investment in and financing of the Batu Hijau copper/gold mine project in Indonesia
	Osakagas Summit Resources Co., Ltd.	Ass.	Investment in oil and natural gas development business
	Petrocoke Japan Ltd.	Sub.	Manufacture and sale of petroleum needle coke
	Soda Ash Japan Co., Ltd.	Sub.	Sale of soda ash from the U.S.
	Sumitomo Shoji Chemicals Co., Ltd.	Sub.	Sale and trade of chemicals and plastics
	Sumitronics Corporation	Sub.	Electronics manufacturing service
	Summit Agro International, Ltd.	Sub.	Development and sales of crop protection products, household insecticides and pet-care products
Summit CRM, Ltd.	Sub.	Trading of carbon-related materials (coke, etc.), refractories and ferrous raw materials	
Summit Pharmaceuticals International Corporation	Sub.	Drug discovery services, pharmaceutical development, and supply of active pharmaceutical ingredients, intermediates and formulations	
<b>Asia</b>	Petro Summit Pte. Ltd. (Singapore)	Sub.	International trade of crude oil and petroleum products
	Sumitronics Taiwan Co., Ltd. (Taiwan)	Sub.	Sale of electronics materials and parts
<b>Europe</b>	Appak LLP (Kazakhstan)	Ass.	Development of uranium mine in Kazakhstan and production/sale of uranium ore concentrates
	SMM Cerro Verde Netherlands B.V. (Netherlands)	Ass.	Investment in the Cerro Verde copper mine in Peru
	Interacid Trading S.A. (Switzerland)	Sub.	International trade of sulfur and sulfuric acid
	Summit Minerals GmbH (Switzerland)	Sub.	Sale of silver, zinc and lead concentrates produced in San Cristobal project in Bolivia
	C & O Pharmaceutical Technology (Holdings) Limited (Bermuda Islands)	Ass.	R&D, manufacture, import, and sale of pharmaceutical products
	Summit Petroleum Limited (U.K.)	Sub.	Exploration, development, production and sale of and investment in oil and natural gas in U.K. North Sea
	Sumi Agro Europe Limited (U.K.)	Sub.	Investment in agricultural chemicals business in Europe
<b>The Americas</b>	Minera San Cristobal S.A. (Bolivia)	Sub.	Mining of San Cristobal silver, zinc and lead project in Bolivia
	Mineração Usiminas S.A. (Brazil)	Ass.	Exploitation, production and export of iron ore and development of related infrastructure
	Summit Agro Mexico S.A. de C.V. (Mexico)	Sub.	Sale of agricultural chemicals in Mexico
	Cantex Inc. (U.S.)	Sub.	Manufacture and sale of polyvinyl chloride pipes
	Pacific Summit Energy LLC (U.S.)	Sub.	Sale of natural gas
	Presperse Corporation (U.S.)	Sub.	Formulation and distribution of specialty ingredients and formulated solutions for the cosmetic and personal care markets
	SC Minerals America, Inc. (U.S.)	Sub.	Investment in the Morenci copper mine, the Pogo gold mine in the U.S. and the Candelaria and Ojos del Salado copper mines in Chile
	Summit Discovery Resources LLC (U.S.)	Sub.	Exploration, development, production, sale of and investment in natural gas in North America
	Summit Petrochemical Trading Inc. (U.S.)	Sub.	Sale and trade of aromatics products
	The Hartz Mountain Corporation (U.S.)	Sub.	Manufacturing, distribution, and sales of pet care products
<b>Oceania</b>	SC Mineral Resources Pty. Ltd. (Australia)	Sub.	Investment in the Northparkes copper mine in Australia
	Sumisho Coal Australia Pty. Ltd. (Australia)	Sub.	Investment in coal mines in Australia
<b>Africa</b>	Ambatovy Minerals S.A. (Madagascar)	Ass.	Mining of Ambatovy nickel project in Madagascar
	Dynatec Madagascar S.A. (Madagascar)	Ass.	Processing and refining of Ambatovy nickel project in Madagascar
	Oresteel Investments (Proprietary) Limited (South Africa)	Ass.	Investment in Assmang iron ore and manganese mine in South Africa

<b>General Products &amp; Real Estate Business Unit</b>			
<b>Japan</b>	Chiba Flour Milling Co., Ltd	Ass.	Flour milling
	Chiba Kyodo Silo Co., Ltd.	Sub.	Operation of silo facility and handling of grain, such as wheat, barley and corn
	Green San-ai Inc.	Sub.	Collection, converting, and sales of recovered-paper

	Subsidiary/ Associated/ Company	Main Business
	HARUMICORPORATION	Ass. Facility management of Harumi Triton Square
	i879 Co., Ltd.	Sub. Online flower gifts order processor
	IG Kogyo Co., Ltd.	Sub. Manufacture and sale of insulated metal panels for roofing and walls
	KISHIWADA CANGAN BAYSIDE MALL CORPORATION	Sub. Management, operation and leasing of multipurpose facilities
	KI Fresh Access, INC.	Ass. Fresh product wholesale
	Musashino Paper Inc.	Sub. Collection, converting, and sales of recovered-paper
	Nissin Sugar Manufacturing Co., Ltd.	Ass. Sugar refining
	REIBI CO., LTD.	Sub. Facility management of buildings in Kansai region
	SAKAUE Co., Ltd.	Ass. Production of vegetables and corn
	S.C. Cement Co., Ltd.	Sub. Sale of cement, ready-mixed concrete and concrete products
	S.C. Cement (Kyushu) Co., Ltd.	Sub. Sale of ready-mixed concrete, concrete products, cement and aggregate
	SC Foods Co., Ltd.	Sub. Import, development, and sale of foodstuffs
	SEVEN INDUSTRIES CO., LTD.	Sub. Manufacture and sale of laminated lumber and wood products
	Shinko Sugar Co., Ltd.	Sub. Sugar refining
	Shinko Sugar Mill Co., Ltd.	Sub. Sugar production
	Sumifru Corporation	Sub. Import and sale of fruits and vegetables
	Sumisho & Mitsuibussan Kenzai Co., Ltd.	Ass. Sale of building materials
	SUMISHO BUILDING MANAGEMENT CO., LTD.	Sub. Property management of office buildings
	Sumisho Paper Co., Ltd.	Sub. Sale of pulp, recovered-paper, paper, paperboard and packaging materials
	Sumisho Realty Management Co., Ltd.	Sub. Asset management business of real estate
	SUMISHO TATEMONO CO., LTD.	Sub. Sales and management of residential properties, housing remodeling
	Sumisho Urban Kaihatsu Co., Ltd.	Sub. Planning, development, management, and operation of shopping centers
	Summit Agri-Business Corporation	Sub. Manufacture and sale of fertilizer and agriculture-related materials
	Summit Oil Mill Co., Ltd.	Sub. Manufacture and sale of vegetable oil and oil meal
	Yasato Kosan Co., Ltd.	Sub. Owning and operating of golf course: Summit Golf Club (Ibaraki Pref.)
	Yokohama City Management Co., Ltd.	Ass. Management, operation and leasing of multipurpose facilities in Minato Mirai 21
<b>Asia</b>	Summit Fertilizer (Foshan) Co., Ltd (China)	Ass. Manufacture and sale of chemical fertilizer
	Summit Fertilizer (Qingdao) Co., Ltd. (China)	Ass. Manufacture and sale of chemical fertilizer
	P.T. Summitmas Property (Indonesia)	Ass. Management, operation and leasing of office buildings
	Sumifert Sdn. Bhd. (Malaysia)	Sub. Import and sale of fertilizers
	Dunlop Tire Thailand Co., Ltd. (Thailand)	Ass. Wholesale of tires to the replacement tire market in Thailand
	Sumi-Thai Fertilizer Co., Ltd. (Thailand)	Sub. Import of fertilizer materials and sale of chemical fertilizers
<b>The Middle East</b>	Shaheen Tyres Company L.L.C. (UAE)	Ass. Import and sale of tires in the UAE
<b>Europe</b>	Dunlop Tire CIS, LLC (Russia)	Ass. Import and sale of tires in CIS (except Ukraine/Mordovskaya)
	OAO Terneyles (Russia)	Ass. General forest products company
	ZAO PTS Hardwood (Russia)	Ass. Manufacture and sale of laminated lumber and wood products
	ZAO STS Technowood (Russia)	Sub. Manufacture and sale of laminated lumber and wood products
<b>The Americas</b>	Volterra S.A. (Chile)	Ass. Afforestation, manufacture and sale of woodchip for paper
	TBC Corporation (U.S.)	Sub. Retail and wholesale of tires
<b>Oceania</b>	Australian Bulk Alliance Pty., Ltd. (Australia)	Sub. Investment in grain export terminal in Australia
	Emerald Group Australia Pty Ltd (Australia)	Ass. Grain collecting
	Summit Rural Western Australia Pty. Ltd. (Australia)	Sub. Import of fertilizer materials and sale of chemical fertilizers in Western Australia
<b>New Industry Development &amp; Cross-function Business Unit</b>		
<b>Japan</b>	Bluewell Corporation	Sub. Agent for casualty insurance and life insurance
	Bluewell Insurance Brokers Ltd.	Sub. Broker for casualty insurance and re-insurance
	GALLIA PLUS Corporation	Sub. Financial service

	Subsidiary/ Associated Company	Main Business
	LS Design Investments Co., Ltd.	Sub. Co-GP firm of "WILL business development consortium (Fund)"
	SC Bio Capital Co., Ltd.	Sub. Investment funds
	Sumisho Global Logistics Co., Ltd.	Sub. Global logistics provider
	Sumisho Materials Corporation	Sub. Trading of precious metals and other products
	Sumitomo Mitsui Finance and Leasing Company, Limited.	Ass. Finance and lease
	Summit Air Service Corporation	Sub. Travel agency
	Tomra Japan Limited	Ass. Collection and recycling of used beverage containers
<b>Asia</b>	Nanjing CMSCL Co., Ltd. (China)	Ass. Automobile related transportation
	Sumisho Global Logistics (China) Co., Ltd. (China)	Sub. Warehousing and distribution services
	Tianjin Dowa Green Angel Summit Recycling Co., Ltd. (China)	Ass. e-Waste recycling business
	Wuxi Sumisho Hi-tech Logistics Co., Ltd. (China)	Ass. Warehousing and distribution services
	Sumitomo Corporation Equity Asia Limited (Hong Kong)	Sub. Venture investment in China and Asia
	P.T. East Jakarta Industrial Park (Indonesia)	Sub. Development, sales, and operation of industrial estate in Indonesia
	PT Sumisho Global Logistics Indonesia (Indonesia)	Sub. Warehousing and distribution services
	First Philippine Industrial Park, Inc. (Philippines)	Ass. Development, sales, and operation of industrial estate in Philippines
	Bluewell Insurance (Singapore) Pte. Ltd. (Singapore)	Sub. Captive insurance company
	Sumisho Capital Management (Singapore) Pte. Ltd. (Singapore)	Sub. Investment management
	Sumisho Global Logistics (Thailand) Co., Ltd. (Thailand )	Sub. Warehousing and distribution services
	Dragon Logistics Co., Ltd. (Vietnam)	Ass. Warehousing and distribution services
	Thang Long Industrial Park Corporation (Vietnam)	Sub. Development, sales, and operation of industrial estate in Vietnam
	Thang Long Industrial Park II Corporation (Vietnam)	Sub. Development, sales, and operation of industrial estate in Vietnam
<b>Europe</b>	Lavansol 1 S.A.S (France)	Ass. Development and operation of solar power generation plant
	Sumisho Global Logistics Europe GmbH (Germany)	Sub. Forwarding, logistics business
	Energia Rinnovabile S.r.l (Italy)	Sub. Development and operation of solar power generation plant
	Energy Power S.r.l (Italy)	Sub. Development and operation of solar power generation plant
	SMFL Capital Corporation B.V. (Netherlands)	Sub. Aircraft operating lease
	Sumisho Aircraft Asset Management B.V. (Netherlands)	Sub. Aircraft operating lease
	Energia Verde De La Macaronesia, S.L. (EVM) (Spain)	Ass. Development and operation of solar power generation plant
	EVM2 Energias Renovables S.L. (EVM2) (Spain)	Ass. Development and operation of solar power generation plant
	Bluewell Reinsurance Company (Bermuda) Ltd. (U.K.)	Sub. Captive insurance company (Rent A Captive)
	Sumitomo Corporation Global Commodities Limited (U.K.)	Sub. Trading and marketing of commodities
<b>The Americas</b>	Presidio Ventures, Inc. (U.S.)	Sub. Strategic venture investment in USA
	Sumisho Global Logistics (USA) Corporation (U.S.)	Sub. International intermodal transport
<b>Oceania</b>	Bluewell Reinsurance (Micronesia) Ltd. (Micronesia)	Sub. Captive insurance company
<b>Domestic</b>		
<b>Japan</b>	Ishida Metal Co., Ltd.	Sub. Processing and sale of stainless steel sheets
	Nippon Katan Co., Ltd.	Sub. Manufacture and sale of power line hardware
	SC Machinery & Service Co., Ltd.	Sub. Sales of equipment for automotive industries and FA products
	Sumisho Airbag Systems Co., Ltd.	Sub. Manufacture and sale of cushion for side curtain airbag
	Sumisho Material Chugoku Co., Ltd.	Sub. Sale of steel materials for civil engineering and construction
	Sumisho Montblanc Co., Ltd.	Sub. Processing and sale of work uniforms and related clothing products
	Sumisho Steel Sheets Works Co., Ltd.	Sub. Processing and sale of steel products
	Tortoise Co., Ltd.	Sub. Sale of interior goods and home furnishing to consumers' cooperatives
<b>Oceania</b>	Summit Wool Spinners Limited (New Zealand)	Sub. Manufacture and sale of wool yarn for carpets

		Subsidiary/ Associated Company	Main Business
<b>Overseas</b>			
<b>The Middle East</b>	Mezon Stainless Steel FZCO (UAE)	Sub.	Sales of stainless steel tubular, pipe, and plates
	SC Tubular and Steel Products (M.E.) FZCO (UAE)	Sub.	Sale of steel tubular and steel products
<b>Europe</b>	Sumisho Global Logistics Europe GmbH (Germany)	Sub.	Forwarding, logistics business
	Summit D&V Kft. (Hungary)	Sub.	OEM supply, sub-assembly and sequence delivery of automotive components
	Summit Auto Poland Sp. z.o.o (Poland)	Sub.	Dealership of Honda motor vehicles
	Summit Motors Poland Sp. z.o.o. (Poland)	Sub.	Dealership of Ford motor vehicles
	Summit Finance Slovakia s.r.o. (Slovakia)	Sub.	Financing of motor vehicles
	Summit Motors Slovakia s.r.o. (Slovakia)	Sub.	Import and sale of Ford motor vehicles and parts
	Summit Leasing Slovenija d.o.o. (Slovenia)	Sub.	Financing of motor vehicles and dealership
	Summit motors Ljubljana d.o.o (Slovenia)	Sub.	Import and sale of Ford motor vehicles and parts
	SC Motors Sweden AB (Sweden)	Sub.	Management company of automotive distributorship and finance company, and wholesale of parts and accessories
	ERYNGIUM Ltd. (U.K.)	Sub.	Manufacturing, processing and distribution of speciality metals for OCTG market
	Sumitomo Corporation Capital Europe Plc (U.K.)	Sub.	Financial services to Group companies
<b>The Americas</b>	Summit Tubulars Corporation (Canada)	Sub.	Sales of tubular products for oil and gas industry
	AMTB Summit, S DE R.L. DE C.V. (Mexico)	Ass.	Blanking and laser-welding of steel parts for automotive industry
	Atlantic Hills Corporation (U.S.)	Sub.	Residential real estate development
	Cantex Inc. (U.S.)	Sub.	Manufacturing and sales of polyvinyl chloride pipes
	Consolidated Systems, Inc (U.S.)	Ass.	Manufacturing and sales of steel products for construction
	Diversified CPC International, Inc. (U.S.)	Sub.	Mixing, refining, and sale of aerosol gases
	Global Stainless Supply, Inc. (U.S.)	Sub.	Wholesale of stainless steel tubes
	Katana Summit LLC (U.S.)	Sub.	Manufacturing of wind power tower
	Leavitt Tube Company, LLC (U.S.)	Ass.	Manufacturing of structural tubing
	123 Mission LLC (U.S.)	Sub.	Office building leasing
	Oxford Finance Corporation (U.S.)	Sub.	Specialty finance dedicated to life science and healthcare industry
	Perennial Power Holdings, Inc. (U.S.)	Sub.	Development, ownership and management of power plants in the U.S.
	Premier Pipe LLC (U.S.)	Sub.	Sales of tubular products for oil and gas industry
	Pipeco Services, Inc (U.S.)	Sub.	Sales of tubular products for oil and gas industry
	SCOA Residential, LLC (U.S.)	Sub.	Investment in house/apartment developments
	1750 K Street LLC (U.S.)	Sub.	Office building leasing
	Stanton Wind Energy, LLC (U.S.)	Ass.	Investment in wind power plant projects
	Steel Summit Holdings, Inc. (U.S.)	Sub.	Steel service center (processing and sale of steel sheets)
	Steel Summit International, Inc. (U.S.)	Sub.	Sales of steel products
	Sumisho Global Logistics (USA) Corporation (U.S.)	Sub.	International intermodal transport
	Summit Wind Energy Inc, (U.S.)	Sub.	Investment in wind power plant projects
	TBC Corporation (U.S.)	Sub.	Retail and wholesale of tires
	The Hartz Mountain Corporation (U.S.)	Sub.	Manufacturing, distribution, and sales of pet care products
	Tubular Solutions Alaska, LLC (U.S.)	Sub.	Sales of tubular products for oil and gas industry
	201 Biscayne LLC (U.S.)	Sub.	Office building leasing
	Unique Machine, LLC (U.S.)	Sub.	OCTG/Accessory threading
	VAM USA, LLC (U.S.)	Ass.	OCTG/ Accessory threading
	V & M Star LP (U.S.)	Ass.	Seamless tubular products mill
<b>Others</b>			
<b>Japan</b>	Sumisho Administration Services Co., Ltd.	Sub.	Personnel & general affair service
	Sumitomo Shoji Financial Management Co., Ltd.	Sub.	Financial services such as cash management, trade settlement, and accounting services to Sumitomo Corporation and its subsidiaries
	Sumitomo Shoji Research Institute, Inc.	Sub.	Research and consulting for Sumitomo Corporation Group companies