

Corporate Governance and Business Operating Structure

Corporate Governance

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Corporate Governance

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.

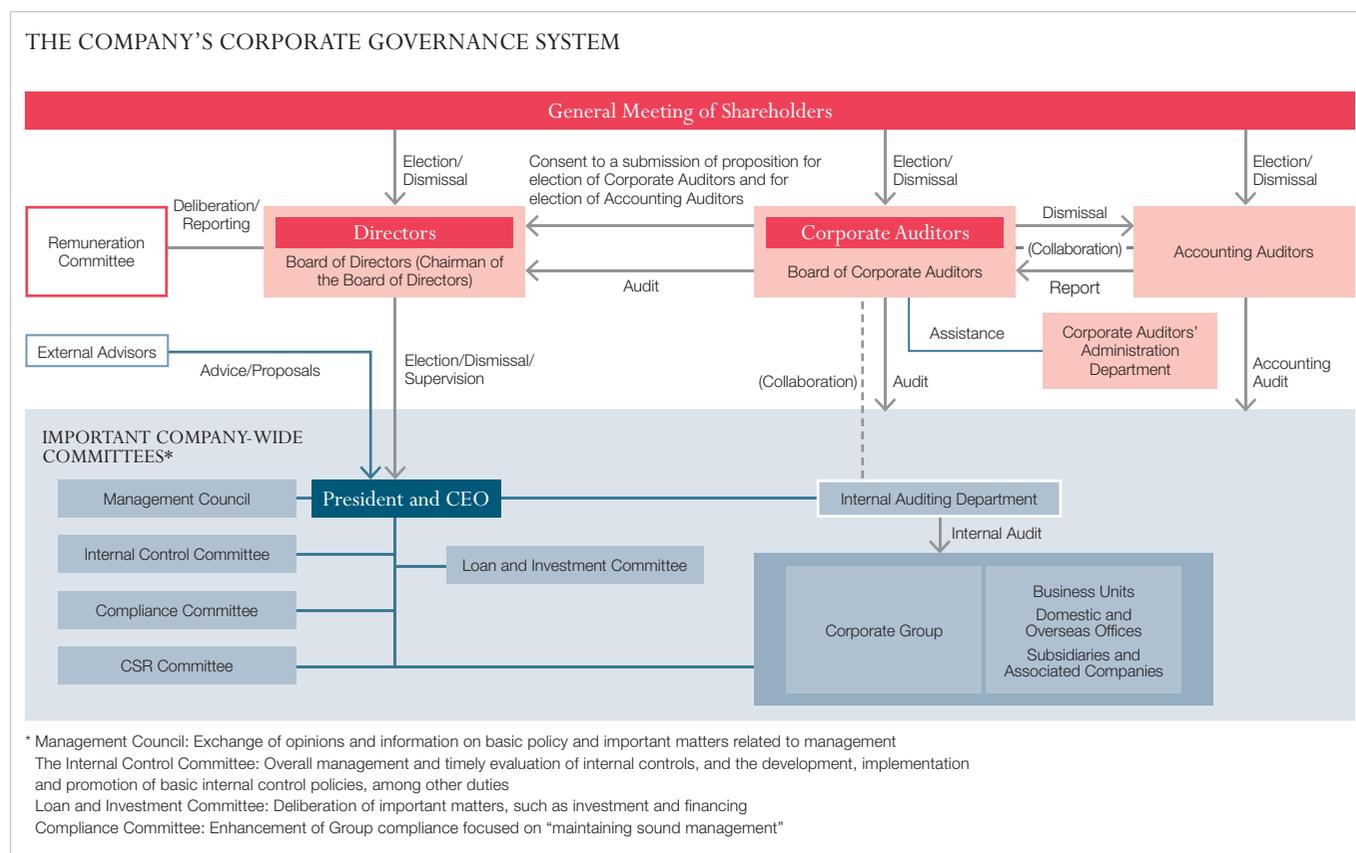
Past Initiatives to Strengthen and Enhance Corporate Governance

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 an 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 companies could choose to adopt a corporation with a committees based system of corporate governance as a result of revisions to the Commercial Code 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 means of improving 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 Chairman of the Board of Directors and the President and CEO 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 2012, 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.

PARTICULARS REGARDING THE REMUNERATION OF THE COMPANY’S DIRECTORS

Particulars regarding the remuneration of the Company’s Directors and Corporate Auditors for fiscal 2011 are as follows:

Classification	Number of payees	Total amount of remuneration, etc.	Additional information
Directors	14 persons	1,274 million yen	The breakdown of the total remuneration in the column to the left is as follows: (1) Monthly remuneration 837 million yen (2) Bonuses resolved at the 144th Ordinary General Meeting of Shareholders 301 million yen (3) Amount recorded as expenses for granting the Tenth New Share Acquisition Rights (issued on July 31, 2011) 20 million yen (4) Amount recorded as expenses for granting the Sixth New Share Acquisition Rights (for a stock-linked compensation plan) (issued on July 31, 2011) 90 million yen (5) Amount recorded as expenses for granting the Fifth New Share Acquisition Rights (for a stock-linked compensation plan) (issued on July 31, 2010) 26 million yen
Corporate Auditors (particulars relating to Outside Corporate Auditors)	5 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.

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.

■ 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.

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 are 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 are 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)

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 are 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
 June 2009 Corporate Auditor of Sumitomo Corporation (incumbent)

■ 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 42 Executive Officers (as of July 31, 2012) 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.

Message from an Outside Corporate Auditor

For 40 years, I have worked at the courts as a judge or in the judicial branch, supporting trials and the courts, as a judicial officer. I was appointed as an outside corporate auditor of Sumitomo Corporation in 2009. When I was first appointed, I felt that my role as a judge, where I interpreted and judged past events in light of evidence and the law, was diametrically opposed to the role of Sumitomo Corporation, which aims to “constantly stay a step ahead in dealing with change and create new value.” However, I developed a deeper understanding of Sumitomo Corporation’s Management Principles and its underlying foundation—the 400-year old “Sumitomo’s Business Philosophy.” In the process, I began to realize that my past experience and Sumitomo Corporation have much in common in terms of “making judgments based on a proper assessment of matters.” At Sumitomo Corporation, Sumitomo’s Business Philosophy and the Management Principles provide the basis for all activities and value judgments, and are deeply ingrained in the organization. I believe that they constitute the very foundation of corporate governance at Sumitomo Corporation.

Let me discuss an example of one of the systems that we are using to raise the

MUTSUO NITTA

Outside Corporate Auditor
Attorney at Law
Appointed as outside corporate auditor in 2009



effectiveness of corporate governance. The Company provides an opportunity every month for the outside corporate auditors to openly discuss a range of topics with the Chairman and President, ranging from current affairs to progress on important projects. At every meeting, the outside corporate auditors receive detailed explanations from the Chairman and President about how they view the changing business environment, as well as matters such as the background to key projects and how these projects are progressing. In response, we ask various questions and express opinions from an external perspective. In this manner, I believe that Sumitomo Corporation’s corporate governance is functioning effectively by

combining a sound basis for value judgments provided by Sumitomo’s Business Philosophy and other principles with effective systems.

The courts are also similar to general trading companies in that both are organizations underpinned by people. In this sense, among the four key actions of the *f(x)* plan, I am strongly interested in “Strengthening Human Resources Management.” How will Sumitomo Corporation nurture human resources that generate maximum value without straying? Although this is a difficult theme, Sumitomo Corporation has made steady progress with these measures. I am confident that this progress will ultimately lead to Sumitomo Corporation’s sustained growth.

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 consumer behavior analysis. However, once I came to the realization that the most powerful factor that moves markets is people, I have consistently focused on people in organizations. Based on that theme, in recent years, I have been working on how to energize middle management and building their organizations.

Just over a year has passed since I was inaugurated as an external advisor of Sumitomo Corporation. I perceive that a business approach based on “Sumitomo’s

Business Philosophy”—in other words, a culture that emphasizes sincerity and soundness while valuing trust, has become an integral part of this company. Meanwhile, I want to encourage even more internal communication within Sumitomo Corporation. Abundant communication between employees produces a variety of cultural exchange. This process will help the company to expand beyond its traditional business domains, and I expect that this will lead to the creation of new value.

Japanese integrated trading companies

have had diverse values because their business models involve extensive business operations. Beginning this year, in my responsibility as a facilitator, I have intentionally provided forums from the perspective of linking people together for members of senior management to communicate across divisional boundaries. By having this dialogue, people have been inspired to think more expansively, deeply and outwardly. My goal is to lay the groundwork for a new drive to boldly create new value.

Today, the world is in the midst of a period of drastic structural change. From the Meiji era to the present day, Japan has transformed its industrial structure extremely skillfully under government leadership. From now on, however, the private sector must take the lead in transforming the nation’s industrial structure. I believe that trading companies are uniquely positioned to fulfill this duty in Japan today. Therefore, I have extremely high hopes for Sumitomo Corporation going forward.

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

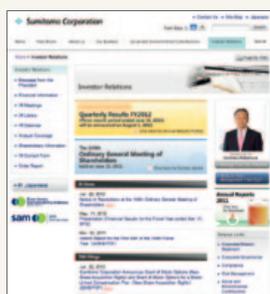
In addition to working to enhance the disclosure of information on our website, in order to ensure direct communication with shareholders and other investors, we hold quarterly meetings attended by management to provide information on our financial results for analysts and institutional investors. For 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 2011, we held six such meetings in five cities, attended by a total of 1,500 individual investors.

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 have continually improved our general operation to further strengthen the Group's internal control since 2005. This improvement effort is based on the result of evaluations that we have performed using a comprehensive checklist. The checklist covers various points pertaining to general operations that should be common across the Group, including risk management, accounting and financial controls and compliance.

Furthermore, we have defined specific internal controls, which have been extracted through analysis of past loss scenarios, etc., as important points that must be strengthened thoroughly on a Company-wide level.

In August 2010, we launched the Internal Control Committee, which 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. The committee promotes Group-wide activities to strengthen our internal control, such as updating the aforementioned checklist to address recent changes in laws and other rules within and outside the company, introducing past cases of loss situations arising from deficiencies in internal controls, and upgrading related instructional materials. Our Business Units and regional organizations in Japan and overseas continue to implement internal control enhancement activities as in previous years. 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.

■ Initiatives for Enhancing the Quality of Operations

The Sumitomo Corporation Group has actively implemented the improvement and monitoring of internal control systems required by law under the Japanese Company Law and the Financial Instruments and Exchange Law on a Company-wide level. We considered these legal obligations as a prime opportunity to promote such improvement in the quality of our operation, as we have implemented ahead of legislative measures around the world.

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." Sumitomo Corporation fulfills the requirements of this law and the Internal Control Committee monitors the operation of such internal control systems.

To comply with the internal control reporting rules stipulated in the Financial Instruments and Exchange Law, which took effect on April 1, 2008, we evaluate the effectiveness of our internal controls as of the fiscal year-end with regard to the Group's financial reporting, through documentation and testing throughout the year, as required by law.

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. All the internal audit results are reported directly to the President after each internal audit, 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 Compliance 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

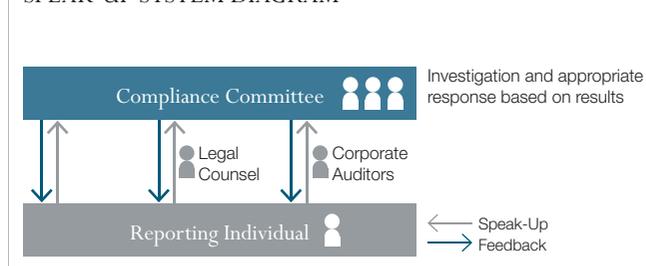
Employees have access to the latest version of the Compliance Manual and other manuals detailing applicable laws and regulations on the Company's intranet. We also offer various training programs and educational activities on compliance, including: programs for specific groups, such as employees, managers 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.

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



GUIDING PRINCIPLES

Business Activities

- Observing Antimonopoly Laws
- Security Trade Control
- Customs / Controlled Items
- Compliance with Applicable Laws
- Respecting and Protecting Intellectual Property Rights
- Prohibition of Unfair Competition
- Information Management
- Preservation of the Environment
- Overseas Business Activities

Corporate Citizen as a Member of Society

- Prohibition on Giving Bribes
- Prevention of Unlawful Payments to Foreign Governmental Officials
- Political Contributions
- Confrontation with Antisocial Forces

Maintenance of a Good Working Environment

- Respect for Human Rights*
- Prohibition of Sexual Harassment
- Prohibition on Abuse of Authority

* Based on the Universal Declaration of Human Rights.

Personal Interests

- Insider Trading
- Conflict of Interest
- Proper Use of Information System

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 the “possibility of losses due to the occurrence of anticipated or unanticipated situations” and as the “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,” which we proactively take to generate a 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 from materializing.

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

Our business is exposed to credit risks, as we extend credit to our customers in the form of accounts receivable, advances, loans, guarantees and other instruments. 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. In addition, we regularly review customers’ credit limits and appropriately manage the credit exposure under those limits. At the same time, we continuously perform credit evaluations on the financial condition of customers, and based on such evaluations, take collateral to secure the receivables if necessary.

■ Managing Market Risks

We set limits on contract balances as well as the loss limits 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 loss limits. 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 the CEO and general managers of each unit and the “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

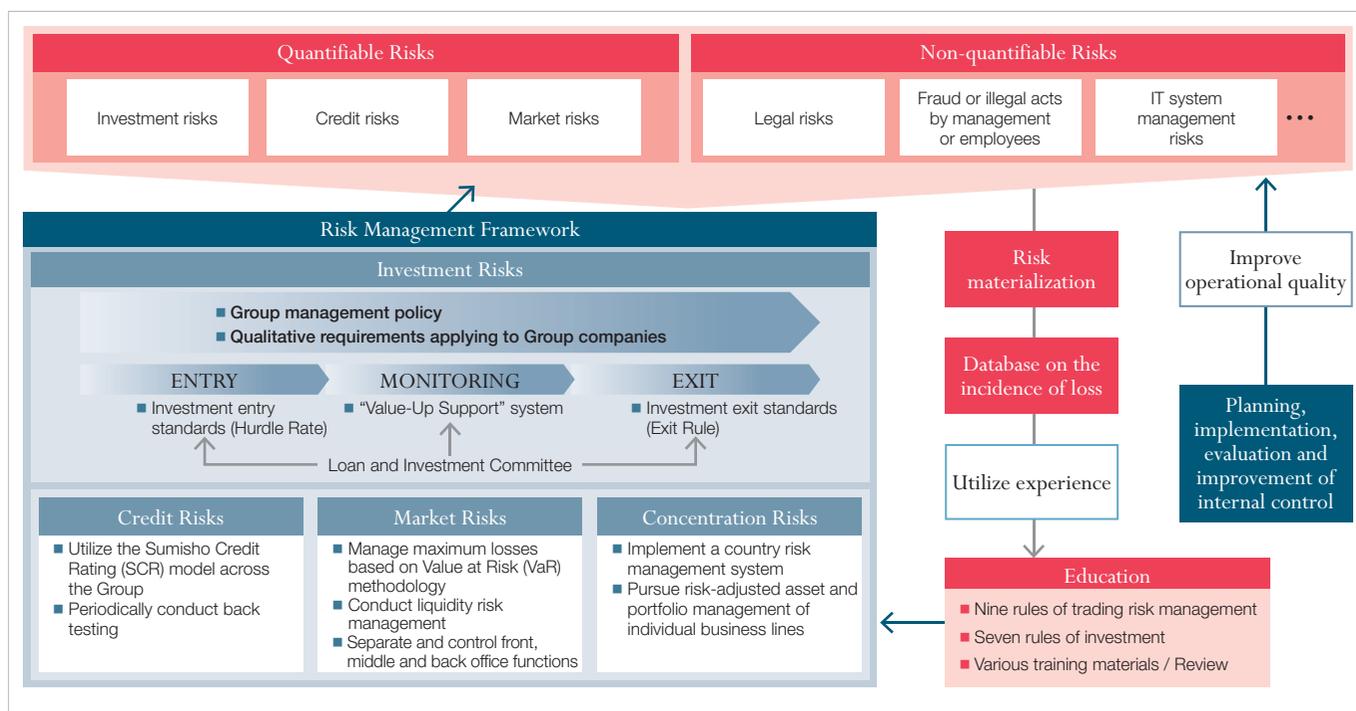
of such loss information that allows for the systematic analysis of the causes of loss-incurring events. These analyses are used as training materials for employees as part of various educational programs. Through this knowledge feedback process, individual employees can upgrade their risk management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



Risk-adjusted Return Management

We are now facing a harsher business environment compared to the past few years, during which we saw steady growth. However, we have been implementing management reforms on the basis of the Risk-adjusted Return Approach for many years, building a business foundation able to sustain stable earnings and a firm financial condition even during severe economic environments. In this special feature, we will introduce Risk-adjusted Return as the backbone of our management approach.

Background to the Introduction of the Risk-adjusted Return Ratio

Until the early 1980s, the main business of Sumitomo Corporation and other integrated trading companies was acting as intermediaries for goods and services. From the late 1980s onward, integrated trading companies sharply stepped up their involvement in new businesses as well as overseas investment as they responded to a decline in demand for trading company financing and the growing transfer of production overseas due to the yen's appreciation.

In the early 1990s, in addition to this business diversification, a series of changes came about in the operating environment. The collapse of the bubble economy in the early 1990s triggered a plunge in stock and real estate prices, and in 1997 the Asian Currency Crisis caused problems for many overseas projects. In addition to the effects of these factors, we recorded substantial impairment of shareholders' equity due to an incident involving unauthorized copper trading in 1996. Thereafter, improving profitability and our financial condition became our topmost priority.

As our Business Units have a variety of business styles in diverse fields, it was difficult to evaluate each business's performance based only on net income. We needed a Company-wide, universal yardstick for measuring the return on management resources invested in each business and for optimally allocating limited management resources.

The basic aim of any business is to generate returns relative to the risks involved and in autumn 1998, ahead of its peers, Sumitomo Corporation introduced the Risk-adjusted Return Ratio as an indicator of profitability, i.e., the degree of return from a certain level of risk.

Specifically, we calculate Risk-adjusted Assets as the value of maximum possible losses by multiplying the value of assets by a risk weight that assumes the maximum possible loss ratio in asset values.

With Risk-adjusted Assets as the denominator, we use returns, i.e., net income, as the numerator to calculate profitability, both in each business and for the Company as a whole.

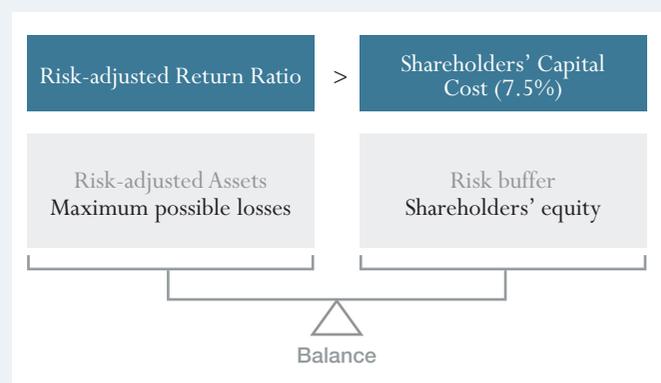
Basics of Risk-adjusted Return Management

Since its introduction as a management indicator, the Risk-adjusted Return Ratio has played a major role as a tool for achieving universal Company-wide objectives.

From the perspective of ensuring business stability, a core management principle is to avoid excessive risks by balancing shareholders' equity (the risk buffer) against Risk-adjusted Assets (maximum possible losses). This principle means that even if all potential risks were to actually occur at once, shareholders' equity would be able to absorb the losses.

Moreover, to ensure earnings power, return on risks must be greater than our shareholders' capital cost. In other words, we set the Risk-adjusted Return Ratio at 7.5% as the minimum requirement for the whole company. In every business, the basis we use for choosing to move forward is this Risk-adjusted Return Ratio of 7.5%.

$$\text{Risk-adjusted Return Ratio} = \frac{\text{Net Income}}{\text{Risk-adjusted Assets (Maximum possible losses)}}$$



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, nearly 300 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.



A training session 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; to always 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 our individual personnel development plan in order to identify and share information on key personnel at Head Office and overseas organizations. Our efforts are focused on development of infrastructure for strategic allocation of Head Office employees and locally hired employees across regions and organizations on a global basis.

[Sumitomo Corporation Global HRD Center]

Sumitomo Corporation's new training center in the Ginza, Tokyo, was completed in March 2012. The new training center serves as a training center to develop global talent and as a strategic multi-purpose facility. As a training center, we use this center to strengthen our human resources development across the entire Group world-



Sumitomo Corporation Global HRD Center

wide and to encourage our diversified human resources management.

The facility also provides 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 Units 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)* management strategy, we carry on what we have done and 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 the Corporate Group to allow our employees to have not only onsite experience but also a Company-wide perspective, as well as our management's point of view. Under the *f(x)* management strategy, we also promote job rotation training across Business Units, with the aim of developing our talent to be 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 being effectively used for sending trainees to overseas offices to develop our global talent in a strategic and well-planned manner. In particular, we are increasing the number of language trainees of Chinese,

Russian, Spanish, Portuguese, etc., to grasp expanding business opportunities in the emerging markets, which will become important management issues for our Group in the future. Furthermore, we are also investing aggressively in human resources development from a medium- and long-term perspective and sending 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 sending locally hired employees of overseas offices to the Head Office.

[Sumisho Business College (SBC)]

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 skills. 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



A training session at SBC

■ 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.

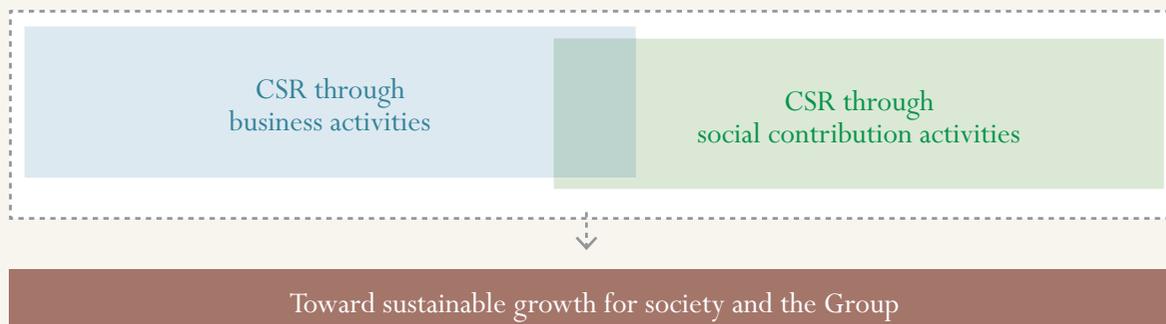
From the standpoint of recruitment, we will seek to diversify our recruitment sources, including in collaboration with our regional organizations and subsidiaries, in addition to increasing the hiring of new graduates and mid-career recruits in Japan. We will also promote personnel development and placement 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

In 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.



* 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 Action Guidelines for Supply Chains. 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 can happen.

In the Tubular Products Group’s worldwide operations, there has been a major focus on strengthening the capabilities of the HSE Global Organization.

The availability of resources has been enhanced with the recruitment of HSE Managers in both the European and Americas Business Units. In conjunction with existing HSE Specialists, the Global HSE Network has been developed to ensure the standardization of HSE Management Systems, and to expedite the implementation and transfer of best practices. The sharing of information and inter-Business Unit communication has improved significantly.

With its increased strength, the Global HSE Network has allowed the Tubular Products Group to work together with the management and workers engaged in Supply Chain Management (SCM) operations and also the subsidiaries to improve HSE activities and performance

more effectively. In fiscal 2011, over twenty reviews were completed in SCM and subsidiaries’ in North American, European, Middle Eastern and Far Eastern locations to identify and subsequently implement HSE improvements.



Indian SCM Project celebrating “3 Years No-Lost Time Incidents” (Barmer, India)

CSR through Business Activities

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.

Helping to Realize a Low Carbon Society by Promoting Businesses Utilizing Lithium-ion Batteries

In September 2010, Sumitomo Corporation established 4R Energy Corporation ("4R"), a joint venture with Nissan Motor Co., Ltd., for the purpose of conducting field tests regarding second-life uses of lithium-ion batteries and creating new markets for energy storage. The "4R" in the new company's name is derived from the first letters of "Reuse," "Refabricate," "Resell," and "Recycle."

The lithium-ion batteries fitted to the Nissan Leaf electric vehicle retain about 80% of their residual battery capacity even after 5 years of use, making second-life use of these batteries highly feasible. 4R is working to develop a business model for collecting and refabricating replaced batteries into second-life products. Furthermore, amid heightened public interest in storage batteries after the Great East Japan Earthquake of 2011, 4R has also developed a household energy storage system. This

system can store around a whole day's worth of power for an ordinary household. It promises economic benefits by enabling daytime use of power stored during the late night hours, and also functions as a backup power supply in the event of a power outage due to natural disasters and other causes. 4R has made preparations to sell this system alongside development efforts, and Sumitomo Forestry Co., Ltd. has decided to adopt 4R's system for their smart houses which commence sales this fall.

Furthermore, Sumitomo Corporation established Japan Charge Network Co., Ltd. in February 2012 together with Nissan Motor, NEC Corporation, and Showa Shell Sekiyu K.K., with the view to conducting business feasibility studies of battery charging services for electric vehicles ("EV"). The EV charging service business will provide infrastructure essential to the popularization of EV by allowing users of EV and plug-in hybrids to reliably and safely charge their vehicles outside their homes or offices. Japan Charge Network plans to develop Japan's first full-fledged membership-based battery charging service across the country. This will be achieved by integrating charging stations installed in various sites over a network using a charge controller (authentication and billing controller) that enables monitoring of the usage of charging stations and other parameters, in addition to member authentication and billing management.

Sumitomo Corporation will continue to promote businesses utilizing lithium-ion batteries, with the aim of contributing to the realization of a low-carbon society.



A household energy storage system



An authentication and billing controller (on the left side)

CSR through Social Contribution Activities

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 where we do business, all over the world. We also take part in various activities as a corporate citizen.

Youth Challenge Program for the Revitalization of East Japan

More than one year has passed since the Great East Japan Earthquake struck in March 2011. During this time, the assistance provided to disaster-hit regions has gradually changed. Sumitomo Corporation believes that an extensive period of time will be needed for these regions to recover from the devastation of this unprecedented natural disaster. Based on a policy of providing long-term assistance for recovery, Sumitomo Corporation is pressing ahead with support activities that fit the needs of the affected regions.

Immediately after the earthquake struck, Sumitomo Corporation began providing emergency assistance through such means as contributing relief money and delivering relief supplies. Thereafter, Sumitomo Corporation provided support in line with the needs of the affected regions at each point in time. For example, over the four months from August to November 2011, around 160 employees in total have continuously participated in our Volunteer Program for Earthquake Disaster Reconstruction. In parallel with these activities, we have also conducted our own surveys to grasp the needs of the affected regions. As a result, those surveys revealed that there was very little support for the younger generations in the affected regions to participate in the recovery effort. These generations range from high school students to university and graduate school students. In response,

Sumitomo Corporation joined forces with the Civil Society Initiative Fund, an NPO, to launch the Sumitomo Corporation Youth Challenge Program for the Revitalization of East Japan to assist young people who will be the future leaders of the affected areas.

This program will provide subsidies of up to ¥100 million a year over the five-year period beginning with the fiscal year ending March 31, 2013. The subsidy will be designed to encourage the participation of younger generations in the regional revitalization process to rebuild the daily lives of people directly affected by the earthquake. At the same time, the program will support the growth of younger generations into leaders of the future. The program consists of two parts: the “activity and research” subsidy (subsidy commenced on June 1, 2012) and the “internship program” (activities commenced on July 1, 2012). The “activity and research” subsidy will support activities, surveys and research directed at regional revitalization that will be carried out mainly by younger generations in teams, circles, or groups, or by NPOs and other organizations led by youth. In fiscal 2012, the program has already subsidized unique activities reflecting the unmistakable enthusiasm of young people and their distinctive personalities. Examples include town restoration proposals, revitalization of local communities, and educational support for children who will be the next generation of young adults. Meanwhile, the “internship program” will encourage the creation of internships for young people at NPOs and other organizations active in the affected regions. The young people participating in this program share a strong dedication and responsibility toward the recovery of the affected regions, and are giving every effort to pursue their respective activities.

Through such support for younger generations participating in regional revitalization activities, Sumitomo Corporation will continue to provide long-term assistance for recovery, in the hope for the early recovery and revitalization of the affected regions.



Our employee volunteers in Yamamoto town, Miyagi



An orientation for the internship program

Directors and Corporate Auditors

(As of July 1, 2012)



SUSUMU KATO
Chairman of the Board of Directors



KUNIHARU NAKAMURA
President and CEO



TOYOSAKU HAMADA
Executive Vice President



TAKASHI KANO
Executive Vice President

Directors and Corporate Auditors

Chairman of the Board of Directors
Susumu Kato

President and CEO
Kuniharu Nakamura

Director
Toyosaku Hamada

Director
Shinichi Sasaki

Director
Takuro Kawahara

Director
Yoshio Osawa

Director
Yasuyuki Abe

Director
Kazuhisa Togashi

Director
Kazuhiro Takeuchi

Director
Masayuki Doi

Director
Toru Furihata

Director
Michihiko Kanegae

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

Kuniharu Nakamura

■ Executive Vice Presidents

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 and President of Sumitomo Corporation of America

■ Senior Managing Executive Officers

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

Kazuhisa Togashi

General Manager, Metal Products Business Unit

Kazuhiro Takeuchi

General Manager, Transportation & Construction Systems Business Unit

Naoki Hidaka

General Manager, Kansai Regional Business Unit

Masayuki Doi

General Manager, Corporate Planning & Coordination Group

Toru Furihata

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

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, Managing Director, Sumitomo Corporation Europe Holding Limited, Chairman and Managing Director, Sumitomo Corporation Europe Limited

■ Managing Executive Officers

Makoto Nakamura

General Manager, Internal Auditing Dept.

Kohei Hirao

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

Michihiko Kanegae

General Manager, Infrastructure Business Unit

Kiyomi Machida

General Manager, Chubu Regional Business Unit

Hideki Iwasawa

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

Koichi Takahata

Assistant General Manager, Financial Resources Management Group, General Manager, Accounting Controlling Dept.

Nobuhiko Yuki

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

Kiyoshi Ogawa

Assistant General Manager, Human Resources, General Affairs & Legal Group, General Manager, Legal Dept.

Masahiro Fujita

Assistant General Manager, Corporate Planning & Coordination Group

■ Executive Officers

Akira Takeuchi

General Manager, Mineral Resources Division, No. 1

Hiroaki Mizobuchi

General Manager, New Business Development & Promotion Division

Masao Sekiuchi

General Manager, Non-Ferrous Products & Metals Division

Masato Sugimori

General Manager, Corporate Planning & Coordination Dept.

Yutaka Sekine

Assistant General Manager for Asia, General Manager, Transportation & Construction Systems Business Unit in Sumitomo Corporation Asia Group, President and CEO, PT. Sumitomo Indonesia

Yoshihiro Fujiura

General Manager for Middle East, Managing Director, Sumitomo Corporation Middle East FZE

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

Masatoshi Hayashi

General Manager, Corporate Communications Dept.

Kimio Fukushima

General Manager, Automotive Division, No. 2

Masao Tabuchi

General Manager, Automotive Division, No. 1

Hirohiko Imura

General Manager, Corporate Risk Management Dept.

Kiyoshi Sunobe

General Manager, Logistics & Insurance Business Division

Hiroki Inoue

General Manager, Construction & Real Estate Division, General Manager, General Construction Development & Coordination Dept.

Yasuhiro Tsuji

General Manager, Basic Chemicals & Electronics Division

Makoto Horie

General Manager, Iron & Steel Division, No. 3

Toshikazu Nambu

General Manager, Tubular Products Division

Masayuki Hyodo

General Manager, Global Power Infrastructure Business Division

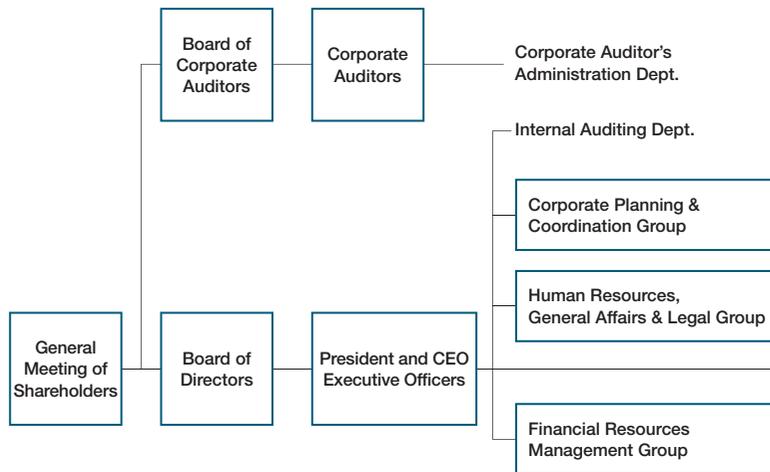
Fumihiko Koba

Deputy General Manager for China, General Manager, China Metal Products Business Unit in Sumitomo Corporation China Group, General Manager, Sumitomo Corporation (Shanghai) Limited

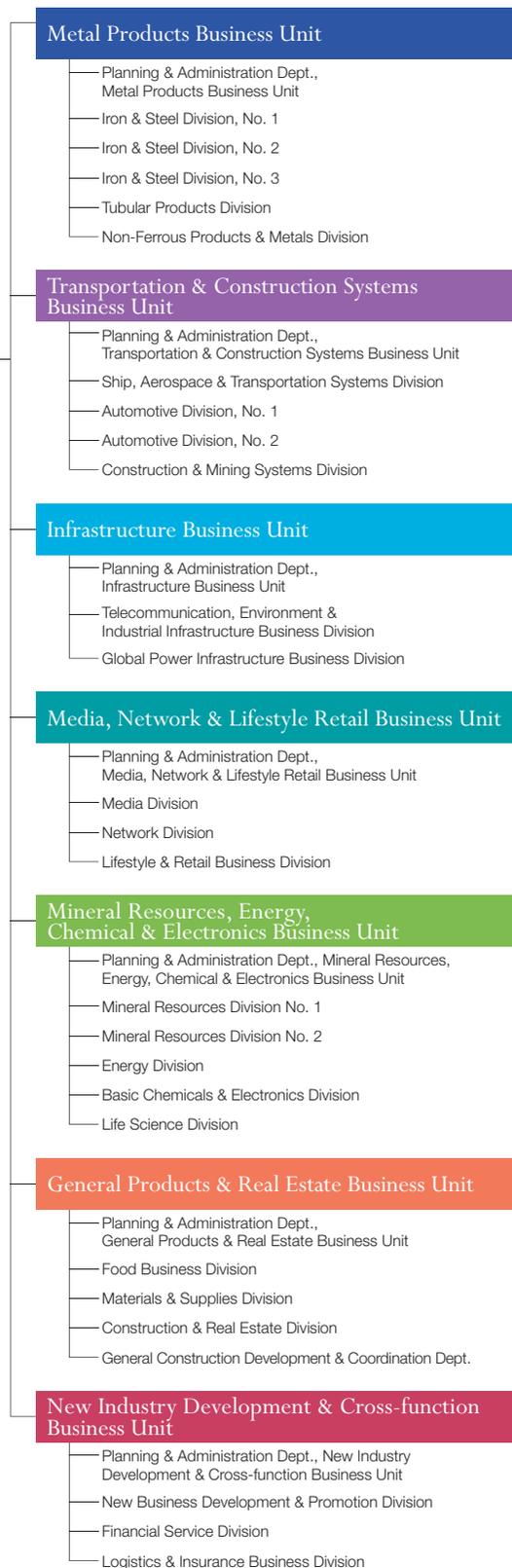
Business Operating Structure Organization

(As of July 1, 2012)

■ CORPORATE GROUP



■ BUSINESS UNITS



JAPAN	OVERSEAS
3 Subsidiaries	39 Subsidiaries
3 Regional Business Units	1 Branch
2 Offices	26 Offices

Regional Business Units and Subsidiaries

(As of July 1, 2012)

Region	Name of Regional Business Unit or Subsidiary	Location
Japan	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
Asia	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	
Oceania	Sumitomo Australia Pty Ltd	Sydney
The Middle East	Sumitomo Corporation Middle East FZE	Dubai
	Sumitomo Corporation Iran, Ltd.	Teheran
	Sumitomo Corporation Dis Ticaret A.S.	Istanbul
Europe and CIS	Sumitomo Corporation (Central Eurasia) LLC	Moscow
	Sumitomo Corporation Europe Holding Limited	London
	Sumitomo Corporation Europe Limited	London
	Sumitomo Corporation España S.A.	Madrid
	Sumitomo Deutschland GmbH	Dusseldorf
	Sumitomo France S.A.S.	Paris
	Sumitomo Benelux S.A./N.V.	Brussels
North America	Sumitomo Canada Limited	Calgary
	Sumitomo Corporation of America	New York
Central America and South America	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, 2012)



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
Erbil
Doha
Bahrain
Kuwait
Riyadh
Jeddah
Alkhobar
Sanaa
Cairo
Amman
Damascus
Tripoli

OCEANIA

Sydney
Melbourne
Perth
Auckland

OVERSEAS: 64 countries

39 Subsidiaries / 89 locations

1 Branch / 1 location

26 Offices / 26 locations

Total 116 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 |
| Wuhan | Vientiane |
| Shanghai | Yangon |
| Nanjing | Dhaka |
| Suzhou | Karachi |
| Tianjin | Islamabad |
| Dalian | Bangkok |
| Shenyang | Manila |
| Qingdao | Jakarta |
| Guangzhou | Surabaya |
| Shenzhen | Hanoi |
| Hong Kong | Ho Chi Minh City |
| Ulaanbaatar | Danang |
| Taipei | New Delhi |
| Kaohsiung | Mumbai |
| Seoul | Chennai |
| Busan | |

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
- 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, 2012)

	Subsidiary/ Associated Company	Main Business	
Metal Products Business Unit			
Japan	Alcut Co., Ltd.	Sub. Shearing, slitting, and blanking of aluminum coils, sheets, and circles	
	Hokkaido Shearing Kaisha, Ltd.	Sub. Shearing, slitting, and sale of steel sheets	
	Ishihara Kohtetu Co., Ltd.	Sub. Stock, sale, and processing of tool steel	
	KS Summit Steel Co., Ltd.	Sub. Shearing, slitting, and sale of steel sheets	
	Mazda Steel Co., Ltd.	Sub. Shearing, slitting, and sale 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 Steel Sheets Works Co., Ltd.	Sub. Shearing, slitting, and sale of steel sheets	
	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	
	Tanimoto Steel Corporation	Sub. Shearing, slitting, and sale of steel sheets	
Asia	Dong Guan Summit Metal Products Co., Ltd. (China)	Sub. Shearing, slitting, and sale of steel sheets	
	Dong Guan S.Y. Metal Ltd. (China)	Sub. Shearing, slitting, and sale of steel sheets	
	Foshan Summit Nikka Mold & Metal Products Co., Ltd. (China)	Sub. Stock, sale, and processing of tool steel	
	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 sheets	
	Tianjin Hua Zhu Metal Products Co., Ltd. (China)	Sub. Shearing, slitting, and sale of steel sheets	
	Wuxi Summit-Bao Metal Products Co., Ltd. (China)	Sub. Shearing, slitting, and sale of steel sheets	
	Zhongshan Nomura Steel Product Co., Ltd. (China)	Sub. Shearing, slitting, and sale of steel sheets	
	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 sheets	
	P.T. Super Steel Karawang (Indonesia)	Sub. Shearing, slitting, and sale of steel sheets	
	Steel Centre Malaysia Sdn. Bhd. (Malaysia)	Sub. Shearing, slitting, and sale of steel sheets	
	Sumiputeh Steel Centre Sdn. Bhd. (Malaysia)	Ass. Shearing, slitting, and sale of steel sheets	
	Calamba Steel Center Inc. (Philippines)	Sub. Shearing, slitting, and sale of steel sheets	
	Mactan Steel Center Inc. (Philippines)	Sub. Shearing, slitting, and sale of steel sheets	
	Asian Steel Company Ltd. (Singapore)	Sub. Shearing, slitting, and sale of steel sheets	
	Mason Metal Industry Co., Ltd. (Taiwan)	Sub. Shearing, slitting, and sale of steel sheets	
	CS Metal Co., Ltd. (Thailand)	Ass. Shearing, slitting, and sale of steel sheets	
	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 sheets	
	Hanoi Steel Center Co., Ltd. (Vietnam)	Sub. Shearing, slitting, and sale of steel sheets	
	Saigon Steel Service & Processing Co. (Vietnam)	Ass. Shearing, slitting, and sale of steel sheets	
	The Middle East	Summit Steel (M.E.) FZCO (UAE)	Sub. Trade of various steel products, and shearing, slitting, and sales of steel sheets
	Europe	Steel Center Europe, S.R.O. (Czech)	Ass. Shearing, slitting, and sale of steel sheets
	The Americas	Servilamina Summit Mexicana S.A. de C.V. (Mexico)	Sub. Shearing, slitting, and sale of steel sheets
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	
Oceania	SC Metal Pty. Ltd. (Australia)	Sub. Investment in aluminum smelting operation in Australia	

	Subsidiary/ Associated Company	Main Business	
Transportation & Construction Systems Business Unit			
Japan	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	Ass. Leasing of motor vehicles	
	Asia	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 transplanter in India	
SML Isuzu Limited (India)		Ass. Commercial vehicle manufacturer	
P.T. Asuransi Sumit Oto (Indonesia)		Sub. Insurance for automobiles and motorcycles	
P.T. Oto Multiartha (Indonesia)		Sub. Financing of automobiles	
P.T. Sumit 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	
The Middle East		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
Europe	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	
	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	
	The Americas	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	
Mazda Motor Manufacturing de Mexico S.A. de C.V. (Mexico)		Ass. Manufacturing 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	
Oceania	Summit Auto Lease Australia Pty Limited (Australia)	Sub. Motor vehicle leasing to corporate customers	
Africa	Toyota Libya FZC (Libya)	Sub. Import and sale of Toyota motor vehicles and parts	

	Subsidiary/ Associated Company	Main Business
Infrastructure Business Unit		
Japan	Inamoto Manufacturing Co., Ltd.	Sub. Manufacture and sale of industrial washing machines
	SC Hiroshima Energy Corporation	Sub. Electricity and steam supply (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, and energy sales for domestic business in the electric power and energy fields
	Summit Power Holdings Limited	Sub. Planning, development and operation of electric power
Asia	MobiCom Corporation (Mongolia)	Ass. Integrated telecommunication service in Mongolia
	Mekong Energy Company Ltd. (Vietnam)	Ass. Power generation and supply of electricity in Vietnam
The Middle East	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
Europe	CBK Netherlands Holdings B.V. (Netherlands)	Ass. Holding company of CBK Power Company Ltd, which operates hydraulic power plant in the Philippines
The Americas	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.
Oceania	Summit Southern Cross Power Pty. Ltd. (Australia)	Sub. Development, ownership and management of power plant in Australia

Media, Network & Lifestyle Retail Business Unit

Japan	Barneys Japan Co., Ltd.	Sub. Import and sale of apparel, accessories, cosmetics, and goods
	EWEL, Inc.	Ass. Corporate benefits administration outsourcing
	Jupiter Shop Channel Co., Ltd.	Sub. Operation of TV shopping channel
	Jupiter Telecommunications Co., Ltd. (J.COM)	Ass. Operation of multiple cable TV systems (MSO) and channels (MCO)
	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"
	SC NETSUPER CORP.	Sub. Online grocery shopping service
	SCSK Corporation	Sub. System integration, IT infrastructure implementation, IT management, BPO, IT hardware & software sales
	Soukai Drug Co., Ltd.	Sub. Internet drugstore
	Sumisho Brand Management Corporation (from April 2012)	Sub. Import, designing and sales of the German luxury line of Chenille fabrics brand "FEILER" and women's apparel and accessories brand, "NARA CAMICIE"
	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
	WAM!NET Japan K.K.	Sub. Data transfer and storage services for video, music and image sources
	Asia	Sumisho E-commerce (Shanghai) Ltd. (China)
PT Sumisho E-commerce Indonesia (Indonesia)		Sub. Online retailer of food and household goods

	Subsidiary/ Associated Company	Main Business
Mineral Resources, Energy, Chemical & Electronics Business Unit		
Japan	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
	Petrocokes 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
Asia	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
Europe	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
	Alcedo SRL (Romania)	Sub. Integrated sale of agricultural materials in Romania
	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
The Americas	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
	SMM Sierra Gorda Inversiones Limitada (Chile)	Ass. Investment in the Sierra Gorda copper and molybdenum mine in Chile
	Summit Agro Mexico S.A. de C.V. (Mexico)	Sub. Sale of agricultural chemicals in Mexico
	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 Agro USA, LLC (U.S.)	Sub. Sale of agricultural chemicals in the U.S.
	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.)	Ass. Manufacturing, distribution, and sales of pet care products
Oceania	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
Africa	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

	Subsidiary/ Associated Company	Main Business	
General Products & Real Estate Business Unit			
Japan	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	
	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	
	KI Fresh Access, INC.	Ass. Fresh product wholesale	
	Musashino Paper Inc.	Sub. Collection, converting, and sales of recovered-paper	
	Nissin Sugar Holdings Co., Ltd.	Ass. Holding company of sugar refinery and sales subsidiaries Shinko Sugar Co., Ltd. and Nissin Sugar Manufacturing Co., Ltd.	
	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 Mill Co., Ltd	Ass. 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	
	Asia	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	
The Middle East	Shaheen Tyres Company L.L.C. (UAE)	Ass. Import and sale of tires in the UAE	
Europe	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	
The Americas	Volterra S.A. (Chile)	Ass. Afforestation, manufacture and sale of woodchip for paper	
	TBC Corporation (U.S.)	Sub. Retail and wholesale of tires	
Oceania	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	
	SUMMIT TYRES AUSTRALIA PTY LTD (Australia)	Sub. Import and wholesale of tires	

	Subsidiary/ Associated Company	Main Business	
New Industry Development & Cross-function Business Unit			
Japan	Bluewell Corporation	Sub. Agent for casualty insurance and life insurance	
	Bluewell Insurance Brokers Ltd.	Sub. Broker for casualty insurance and re-insurance	
	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	
Asia	Nanjing CMSCL Co., Ltd. (China)	Ass. Automobile related transportation	
	Sumisho Global Logistics (China) Co., Ltd. (China)	Sub. Warehousing and distribution services	
	Tianjin Dow Green Angel Summit Recycling Co., Ltd. (China)	Ass. e-Waste recycling business	
	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 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	
	Europe	Lavansol 1 S.A.S (France)	Ass. Development and operation of solar power generation plant
Sumisho Global Logistics Europe GmbH (Germany)		Sub. Warehousing and distribution services	
SMBC Aviation Capital Limited (from June 2012) (Ireland)		Ass. Aircraft operating lease	
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 Aircraft Capital Corporation B.V. (Netherlands)		Ass. 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	
The Americas		Presidio Ventures, Inc. (U.S.)	Sub. Strategic venture investment in the U.S.
		Sumisho Global Logistics (USA) Corporation (U.S.)	Sub. International intermodal transport
Oceania	Bluewell Reinsurance (Micronesia) Ltd. (Micronesia)	Sub. Captive insurance company	

Domestic

Japan	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 factory automation products
	Sumisho Airbag Systems Co., Ltd.	Sub. Manufacture and sale of cushions for side curtain airbags
	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
	Tortoise Co., Ltd.	Sub. Sale of interior goods and home furnishing to consumers' cooperatives
Oceania	Summit Wool Spinners Limited (New Zealand)	Sub. Manufacture and sale of wool yarn for carpets

	Subsidiary/ Associated Company	Main Business	
Overseas			
The Middle East	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	
Europe	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	
	The Americas	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. Investment in house developments	
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 LLC (U.S.)		Ass. Specialty finance dedicated to life science and healthcare industry	
Pipeco Services, Inc (U.S.)		Sub. Sales of tubular products for oil and gas industry	
Premier Pipe LLC (U.S.)		Sub. Sales of tubular products for oil and gas industry	
Pyramid Tubular Products, L.P. (U.S.)		Ass. 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. Shearing, slitting, 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.)		Ass. 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. Threading and processing of tubular products for oil and gas industry	
VAM USA, LLC (U.S.)		Ass. Threading and processing of tubular products for oil and gas industry	
V & M Star LP (U.S.)		Ass. Seamless tubular products mill	
Others			
Japan	Sumisho Administration Services Co., Ltd.	Sub. Personnel and general affairs services	
	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	