

Corporate Disclosure Policy

1. Objective

This Corporate Disclosure Policy sets out the basic principles for the disclosure of material corporate information to all stakeholders in a timely and proper manner.

2. Basic Principles

Sumitomo Corporation not only discloses information in compliance with applicable laws and regulations, including the rules of financial instruments exchanges, but also voluntarily discloses as much information as possible to deepen all stakeholders' understanding of the company's management policies and business activities.

The basic principles for the disclosure of material corporate information are as follows:

■ 1. Compliance with applicable laws and regulations

We comply with the Financial Instruments and Exchange Act, the Companies Act and all other applicable laws and regulations, including the rules established by financial instruments exchanges.

■ 2. Transparency

In disclosing information, we give importance to transparency and provide information that is transparent, consistent and supported by facts.

■ 3. Usefulness

We provide information in a way that is useful and easy to understand from the perspective of a stakeholder.

■ 4. Timeliness

When information that should be disclosed is made known to us, we disclose it in a timely manner.

■ 5. Fairness

We place importance on communicating material corporate information to all stakeholders in a fair manner.

3. Scope of Application

“Material corporate information” in this policy is defined as follows:

- 1. Information that is required to be disclosed under the Financial Instruments and Exchange Act, the Companies Act and all other applicable laws and regulations, and the rules of financial instruments exchanges, including the Securities Listing Regulations of the Tokyo Stock Exchange.**
- 2. Information which is not required to be disclosed under applicable laws and regulations or the rules of financial instruments exchanges but which are determined by Sumitomo Corporation to be useful with respect to deepening all stakeholders’ understanding of our management policies and business activities.**

4. Authority for Information Disclosure

The authority to disclose material corporate information lies with the President, the Chief Strategy Officer, the Chief Financial Officer, the Assistant CFO of the Finance and Accounting, the General Manager of the Investor Relations Department, the General Manager of the Corporate Communications Department, the General Manager of the Finance Department, the General Manager of the Accounting Controlling Department and those authorized by the aforementioned, all within Sumitomo Corporation.

5. Management of Insider Information

We ensure that our internal regulations that specify the code of conduct for managing material corporate information and the sale and purchase of company stocks by corporate executives and employees are strictly complied with, in order to prevent insider trading.

6. Period of Silence

We designate the period commencing from the day following the last day of an accounting period (including quarterly settlements) and ending on the date of announcement of the financial statement of the accounting period as a "period of silence" during which we do not make any comments or disclosures on account settlements and do not respond to any related inquiries, except with regard to information that has already been disclosed to the public.

7. Market Rumors

With regard to media coverage or the spread of market rumors based on speculation about Sumitomo Corporation, in principle, we do not make any disclosures or comments in response to related inquiries.

If we determine that the speculation concerned could significantly affect the market value of our stocks, we take appropriate actions, such as timely disclosure of related information or timely issuance of a press release on the subject matter.