

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 transgressions in pursuit of profit for the Company. In order to promote compliance, Sumitomo Corporation has introduced the position of Chief Compliance Officer and has also established the Compliance Committee, who together continue to strive to prevent compliance violations from occurring. The Company's Compliance Manual was prepared to contribute to such purpose and is personally possessed by each and every officer and employee in the Company. The Compliance Manual adopts 19 Compliance Guiding Principles (listed below for reference) to cover key areas and uphold the Company's requirement that: "If there is even a trace of doubt, do not 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.

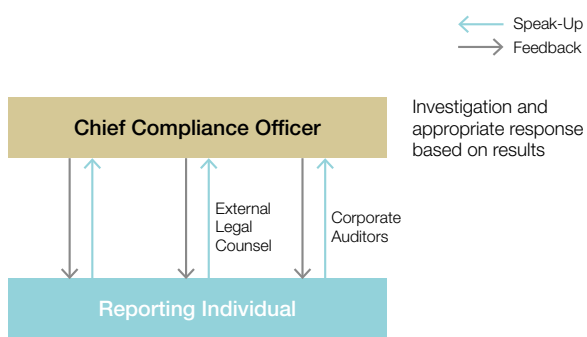
Compliance Training and Education

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 continuously hold e-learning compliance seminars open to all officers and employees from all levels.

Speak-Up System

If an employee becomes aware of a possible compliance problem, he or she will usually report 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 Chief Compliance Officer. External 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 impact the reporting employees due to such reporting. The Chief Compliance Officer is responsible for handling all the information received in an appropriate manner.

Speak-Up System Diagram



Guiding Principles

Business Activities	Corporate Citizen as a Member of Society	Maintenance of a Good Working Environment	Personal Interests
<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • Prohibition on Giving Bribes • Prevention of Unlawful Payments to Foreign Governmental Officials • Political Contributions • Confrontation With Antisocial Forces 	<ul style="list-style-type: none"> • Respect for Human Rights* • Prohibition of Sexual Harassment • Prohibition on Abuse of Authority 	<ul style="list-style-type: none"> • Insider Trading • Conflict of Interest • Proper Use of Information System

* Based on the Universal Declaration of Human Rights