

Compliance

The Activity Guidelines serve as the fundamental basis of the Sumitomo Corporation Group's compliance initiatives: "To comply with laws and regulations, while maintaining the highest ethical standards." Giving first priority to compliance and reporting compliance issues immediately are fundamental principles of our corporate activities.



Giving First Priority to Compliance

Giving first priority to compliance means that compliance takes priority over all corporate activities, and that the Group must never violate compliance as a result of giving priority to the pursuit of profit. To heighten the awareness of our officers and employees

towards compliance principles, we distribute compliance manuals covering our Compliance Guiding Principles and conduct various types of compliance education programs.

Reporting Compliance Issues Immediately

In the Sumitomo Corporation Group, we constantly remind our officers and employees about the importance of reporting compliance issues immediately. If a compliance issue arises, they must report the issue to their superiors or the relevant department without delay and take the most appropriate measures in response. To ensure the rapid and early discovery of potential

compliance issues and timely responses to them, we have implemented a so-called "Speak-Up System," which enables officers and employees to report any compliance issues directly to the Chief Compliance Officer in addition to through their normal reporting lines.

New Compliance Regime

Aiming to enable more agile responses to compliance issues, in 2015 Sumitomo Corporation established the position of Chief Compliance Officer, who has ultimate responsibility for compliance matters. Further, the Compliance Committee, which plans and prepares compliance related measures, includes not just general managers of the Corporate Group but also general managers of

the business divisions, enabling it to examine compliance related measures in a multifaceted manner that reflects our actual business operations. In addition to such initiatives at Sumitomo Corporation, our Group companies are also endeavoring to establish internal systems giving first priority to compliance, and we are fully committed to the continued advancement of such efforts.

