

PART 4

Governance

Strengthening Our Foundation of Value Creation

As an enterprise, to adapt to the changing business environment and move forward with sustainable value creation, we need to constantly strengthen our corporate governance structure as a solid foundation.

Sumitomo Corporation has designated the enhancement of corporate governance as a key initiative and is working on upgrading the relevant structures, including raising the effectiveness of Board of Directors' meetings.

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Messages from Outside Directors

Toward further strengthening our corporate governance, outside directors with extensive knowledge and rich experience in various fields bring diverse perspectives to the discussion.

Strengthening governance by adapting to the changing environment

Nobuyoshi Ehara
Outside Director



I have served as an outside director of Sumitomo Corporation for four years. I believe I have developed a close working relationship based on trust with many senior executives. Yet, it has remained of utmost importance to me to be objective and critical, to represent our shareholders' interests.

In recent years, the Company has focused on energizing the organization and developing dynamic human talents. These themes are actively discussed on the Board, and the Nomination and Remuneration Advisory Committee. After an extensive review conducted by the committee in 2018, the remuneration system was revised to strengthen performance orientation. This change will help enhance the Company's investment-related decision-making skills and develop its

value-added capabilities. As the Company's business model as an integrated trading firm continues to evolve with increasing investment activities, it is vital for Sumitomo Corporation to upgrade its personnel development program and compensation system.

In 2020, the COVID-19 pandemic has given rise to an unprecedented situation. We must realize that unexpected challenges like this can occur at any time. It is imperative that Sumitomo Corporation further strengthen its corporate governance in order to develop its ability to absorb shocks and adapt to changes in any business environment. My efforts remain committed to realizing this goal.



In-depth discussion at off-site sessions to further improve the effectiveness of the Board of Directors

Koji Ishida
Outside Director

For the last few years, an evaluation of the effectiveness of the Board of Directors has been carried out every year by a third-party organization. This consists of a questionnaire-based self-assessment and an interview with each Board member, with any necessary improvements reflected in the Board's subsequent operation. In the free comment section of the questionnaire and during the interview, a wide range of opinions and suggestions are presented by outside and internal directors and Audit & Supervisory Board members on how to improve the effectiveness of the Board of Directors. These opinions and suggestions are wide-ranging, reflecting the differing backgrounds and circumstances of the Board members, and so they are rather difficult to summarize immediately. Nevertheless, the perception of

issues on which these opinions are based can be grouped under several headings.

We have therefore decided to hold a series of off-site sessions for Board members to enable more in-depth discussion of specific perceived issues, including the securing of diversity within the Board of Directors and the strengthening of its supervisory function. These discussions are used to summarize opinions on the future direction of policy, which will be reflected in concrete measures going forward. As a member of the Board of Directors, I too am taking an active part in these discussions. I look forward to seeing the results of this initiative reflected in policy at an early date, leading to further improvement of the Board's effectiveness.

Diversity is important, not only in personal characteristics but also in experience and expertise

Kimie Iwata
Outside Director



The reason why diversity is sought in the Board of Directors is to promote optimal management decision-making based on active discussion from a variety of perspectives in terms of values, experience, and expertise. The Sumitomo Corporation Corporate Governance Principles also recommend that the Board should have diversity in experience, knowledge, expertise, gender, and other areas.

When we hear the word diversity, we think first of diversity in characteristics such as gender and nationality. Diversity in such characteristics is of course sought because differences here are likely to be reflected in differences in values, experience, expertise, and other areas. Although the Company has two female outside directors including myself, there are no female internal directors or Audit & Supervisory Board members. There are also no non-

Japanese directors or Audit & Supervisory Board members. I think that increasing the number of women and overseas nationals to bring more characteristic diversity to the Board of Directors would contribute to realizing diversity among executive officers and employees.

In addition to diversity of personal characteristics, equally or even more important is diversity of experience and expertise. The Company recognizes the importance of this, and as such attaches a skill matrix to the convocation notice for the General Meeting of Shareholders and other communications. The matrix is revised in response to occasional management issues, and I believe this practice should continue.

Going forward, we will further promote diversity within the Board of Directors, thereby raising its effectiveness.



The Board of Directors continues to evolve through flexible operation and fast-reacting improvement

Hisashi Yamazaki
Outside Director

Two years have passed since my appointment as director. Having spent many years in the legal profession, it has been a new experience for me. Although I have struggled with some of the realities of Board meetings, for instance the economics and management terminology, each one has been different and has sparked my curiosity. All the more so since the Board of Directors has been going through changes, some of which I would like to talk about here.

First, the Board of Directors now operates flexibly, with opinions taken on board promptly and fast-reacting improvements and innovations carried out. Since I first joined the Board, I have been impressed by the free and open exchange of opinions, even though that sometimes led to protracted meetings. Dealing with detailed questions through explanation in advance so that discussion on the day can concentrate on essential points has made the meetings more focused. Also, the seating used to be arranged so that

internal directors and outside directors were on opposite sides, but now we draw lots for seats, apart from those of the chairperson and the president. Due to this, the discussion moves in all directions, so you never know where the next comment is coming from, which contributes to a more active discussion. Moreover, the meetings now start with a summary of the Management Council's discussions, which lays out the issues more clearly. Recently, Board meetings have been followed up with off-site sessions, which provide the opportunity for free discussion of such topical themes as climate change.

Serving on the Board of Directors as it continues to evolve, I want to draw fully on my knowledge and experience to contribute to the development of Sumitomo Corporation, while embracing a part of Sumitomo's Business Philosophy that really impressed me—"Benefit for self and others, private and public interests are one and the same."

Messages from Outside Directors



Working for corporate value increases with business experience and perspectives gathered in the information and telecommunications industry

Akiko Ide
Outside Director

On my appointment as outside director, I received orientations from Sumitomo Corporation's various business units and corporate groups. It struck me that the business of an integrated trading company has drastically changed and that the Company is acting to accelerate the pace of innovation going forward. As it sets out on a new path for the next 100 years after marking the centenary of its foundation in 2019, I feel excited to be part of this innovation and evolution.

Under Medium-Term Management Plan 2020, the Company is promoting Digital Transformation (DX) to increase the value of existing businesses and create new businesses. This strikes me as having aspects in common with initiatives in the information and telecommunications industry, where I spent more than 40 years. The industry has been trying to

create new business models and improve productivity through hybridization between information and communications technology (ICT) and a wide range of other industries as a way of resolving social issues.

The COVID-19 crisis will inevitably have a major impact on industry and society, but by carrying on Sumitomo's Business Philosophy—"Benefit for self and others, private and public interests are one and the same"—I hope to see the Company contributing to the resolution of various social issues.

By bringing to management the business experience and diverse perspectives and values I have accumulated, I intend to do all in my power as an outside director to increase the corporate value of Sumitomo Corporation.

Reasons for appointing outside directors

Name	Reason for appointment	Term of office as director	Expertise and experience					
			Business management	Investment	Finance	Legal affairs	Government body	Information and telecommunications
Nobuyoshi Ehara	Wide-ranging knowledge and a wealth of experience in finance and business management accumulated during many years of engagement in a major U.S. investment bank and the management of a private-equity firm.	4 years	●	●	●	—	—	—
Koji Ishida	Wide-ranging knowledge and a wealth of experience in finance and business management accumulated during many years of engagement in a major financial institution and past position as a member of the Policy Board at the Bank of Japan.	3 years	●	●	●	—	●	—
Kimie Iwata	Wide-ranging knowledge and a wealth of experience in business management, corporate governance, corporate social responsibility, and diversity accumulated in managerial and Outside Director positions for private companies, before which she served in a succession of key positions in the Ministry of Labour (currently the Ministry of Health, Labour and Welfare) over the course of many years.	2 years	●	—	—	—	●	—
Hisashi Yamazaki	Highly specialized knowledge and a wealth of experience in law accumulated over the course of many years as a judge and an attorney at law.	2 years	—	—	—	●	●	—
Akiko Ide	Wide-ranging knowledge and a wealth of experience in information and telecommunications, business management, and corporate governance accumulated during many years of engagement in a major telecommunications carrier, the management of a group company and a full time audit & supervisory board member of the parent (holding) company.	New appointment	●	—	—	—	—	●

Corporate Governance

Corporate governance principles

Sumitomo Corporation established the Sumitomo Corporation Corporate Governance Principles while keeping in mind that the backbone of our corporate ethics is in Sumitomo's Business Philosophy and Management Principles. The Sumitomo Corporation Corporate Governance Principles were established based on our view that the essence of corporate governance is improving management efficiency and

maintaining sound management, as well as ensuring management transparency to secure the first two. In line with the Principles, we seek constantly to establish the most appropriate managerial system for the Company and work to continuously strengthen our corporate governance to realize management that serves the interests of all stakeholders including shareholders.

System and features of corporate governance

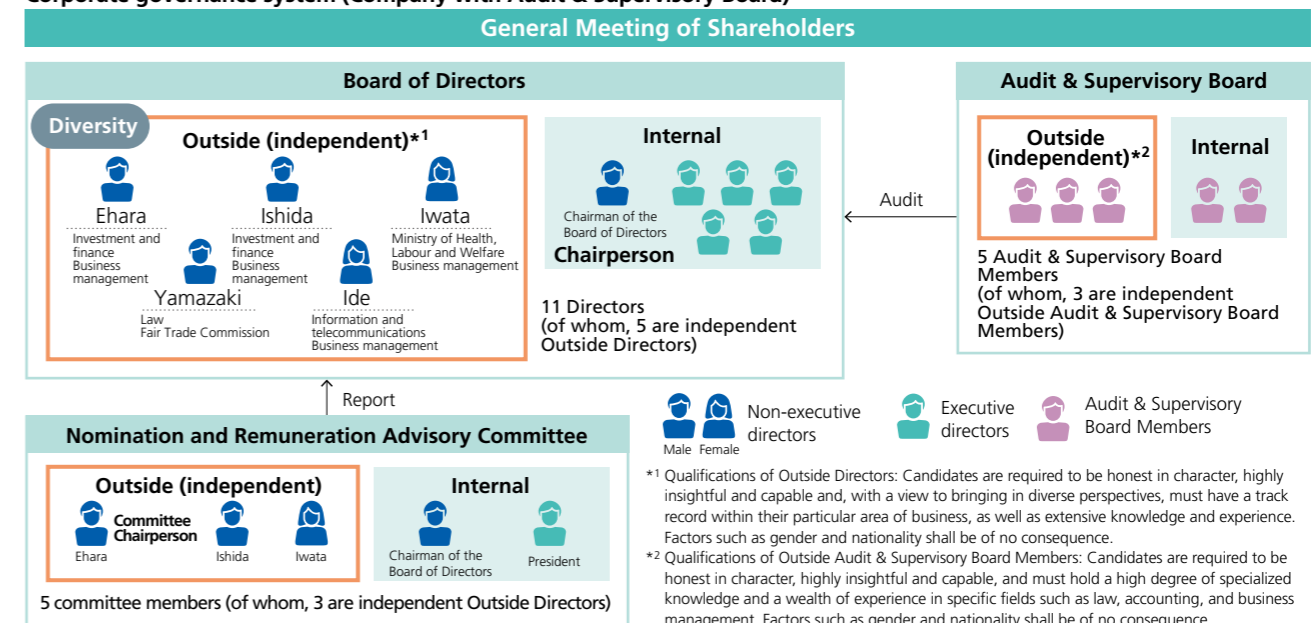
Sumitomo Corporation, which has adopted an Audit & Supervisory Board system, seeks to strengthen the supervision and monitoring of management through the appointment of Outside Directors and Outside Audit & Supervisory Board Members, who have an independent stance, and through the establishment of a Nomination and Remuneration Advisory Committee composed, in the majority, of independent

Outside Directors. Meanwhile, the introduction of an executive officer system and the establishment of a Management Council are among the measures designed to promote speedier and more efficient decision-making and execution of business as part of the effective corporate governance system we have worked to put in place.

Overview of corporate governance system (As of June 19, 2020)

Form of organizational structure	Company with Audit & Supervisory Board
Number of directors	11 (of whom, 5 are Outside Directors); 1-year term
Term of Chairman of the Board of Directors, President and Chief Executive Officer, and Outside Directors	No more than 6 years, in principle
Number of Audit & Supervisory Board Members	5 (of whom, 3 are Outside Audit & Supervisory Board Members); 4-year term
Executive officers	Executive officer system adopted
Voluntarily established bodies as advisory bodies to the Board of Directors	Nomination and Remuneration Advisory Committee
Detailed information on corporate governance (website)	https://www.sumitomocorp.com/en/jp/about/governance/detail
Accounting auditors	KPMG AZSA LLC

Corporate governance system (Company with Audit & Supervisory Board)



Corporate Governance

Structures to enhance management efficiency and maintain sound management

Directors and the Board of Directors

Composition of the Board of Directors and appointment of Outside Directors

The membership of the Board of Directors is appropriate in numerical terms to facilitate adequate discussion and speedy and rational decision-making, and provides diversity in terms of experience, knowledge, specialism, gender, and other characteristics. Moreover, of the 11 Directors appointed, five must be Outside Directors to ensure appropriate decision-making from diverse perspectives and to further strengthen the supervisory functions of the Board of Directors. Each Outside Director meets the independence criteria of Tokyo Stock Exchange, Inc. or other relevant body and the in-house rules on Standards for Appointment and Independence of Outside Directors and Outside Audit & Supervisory Board Members.

Improvement of deliberation and enhancement of monitoring function at the Board of Directors

Agenda items for the Board of Directors are carefully selected to promote more focused discussion of management policy and plans and other important matters of relevance to companywide management. To further strengthen its business execution monitoring functions, the Board receives reports from each business unit on the state of progress of its strategy and any associated issues, as well as its response to the issues, with the report followed by a discussion focusing on the relevant issues. The Board also periodically monitors the state of business execution companywide, for instance by receiving reports on the activities of the main corporate committees and portfolio reports covering market fluctuation risk, country risk, and other concentration risks. Moreover, to further enhance the quality of its discussion, the Board of Directors holds off-site sessions for free and frank discussion of important management topics, including management policy and plans and issues in the ESG field.

Separation of roles between the Chairman of the Board of Directors and the President and Chief Executive Officer and limitation of their terms of office

To allow mutual checks and balances, the posts of Chairman of the Board of Directors and President and Chief Executive Officer are in principle separate and not to be held jointly by the same individual. The Chairman of the Board of Directors convenes meetings of the Board of Directors and presides over them as Chairperson, and engages in external relations activities. Furthermore, the Chairman supervises management but does not engage in routine operations and has no representative powers. Additionally, the terms of office of the Chairman of the Board of Directors and of the President and Chief Executive Officer are in principle set at six years in each case. This is to

exclude the potential negative influence on governance of long-term absence of turnover in senior management.

Establishment of an advisory body to the Board of Directors

The Nomination and Remuneration Advisory Committee, which is composed, in the majority, of Outside Directors and chaired by an Outside Director, operates as an advisory body to the Board of Directors. The committee is charged with the following items and reports the results thereof to the Board of Directors: (1) Policy and procedure for the appointment and dismissal of the President and Chief Executive Officer; (2) Policy and procedure for the appointment and dismissal of the Chairman of the Board of Directors; (3) Nomination criteria for Directors and Audit & Supervisory Board Members; (4) Appointment and dismissal of the President and Chief Executive Officer (including nomination of successor); (5) Nomination of candidates for Director and Audit & Supervisory Board Member (including deciding representative and executive directors); (6) Appointment of Management Council members; (7) System and level of remuneration and bonus payments for Directors and Executive Officers and remuneration range for Audit & Supervisory Board Members; and (8) Consultation on the advisor system.

Composition of the Nomination and Remuneration Advisory Committee

Total Members	Internal Directors	Outside Directors	Committee Chairperson
5 persons	2 persons (Chairman of the Board of Directors, President and Chief Executive Officer)	3 persons ▶ See p. 96	Outside Director

Main discussion themes of FY2019 Board of Directors' meetings and its off-site sessions (important management topics and activities of committees)

<p>Management plans</p> <ul style="list-style-type: none"> Progress review of Medium-Term Management Plan 2020 Issues and directions for post Medium-Term Management Plan 2020 Regular reporting by business units
<p>ESG-related</p> <ul style="list-style-type: none"> Enhancing sustainability management Policies on climate change issues Sumitomo Corporation Group's Human Rights Policy The United Kingdom's Modern Slavery Act 2015 Revision of Sumitomo Corporation Corporate Governance Principles Evaluation of the effectiveness of the Board of Directors: reports on results, improvement measures
<p>Reports on committee activities</p> <p>Compliance Committee, IR Committee, Corporate Sustainability Committee, etc.</p>

Training and information provision for Directors and Audit & Supervisory Board Members

On taking office, Outside Directors and Outside Audit & Supervisory Board Members have the opportunity to receive a briefing on areas including the Sumitomo Corporation Group's Management Principles, management policy, business activities, finances, organization, medium-term management plan, and risk management system. Additionally, Directors and Audit & Supervisory Board



On-site observation at automotive parts manufacturer Kiriu Corporation for Outside Directors and Outside Audit & Supervisory Board Members

Members are provided with the opportunity to receive training from specialist outside organizations.

To deepen their understanding of Sumitomo's Business Philosophy, Outside Directors and Outside Audit & Supervisory Board Members, in principle, visit a Sumitomo-related facility during the first fiscal year of their term of office. Outside Directors are also given the opportunity to make an on-site observation visit to a facility in Japan and to an overseas facility at least once a year.

Prior to every meeting of the Board of Directors, we give a briefing to Outside Directors and Outside Audit & Supervisory Board Members on the agenda items due for discussion.

Evaluation of the effectiveness of the Board of Directors

To maintain and heighten the effectiveness of the Board of Directors, each year Directors and Audit & Supervisory Board Members analyze and evaluate its effectiveness through the use of self-evaluations and other means. We disclosed a summary of the results.

The evaluation of effectiveness of the Board of Directors and its results for FY2019 is summarized below:

Initiatives to further improve effectiveness of the Board of Directors (PDCA cycle)

Plan	Do	Check	Act
<p>Main issues in FY2018</p> <p>Further enhance reporting on business unit strategies and their state of progress</p> <p>Review time allotted for discussion</p> <p>Improve explanatory materials</p>	<p>Main initiatives in FY2019</p> <p>Focus briefing and discussion on issues in implementation of Medium-Term Management Plan 2020 and associated response policy</p> <p>Enhance discussion by concentrating on key points</p> <ul style="list-style-type: none"> Clarify main discussion points in meeting materials (e.g., provide executive summary), give enhanced briefing in advance of Board of Directors' meetings and promote enhanced exchange of opinions at off-site sessions Explain specialist terminology, e.g., in footnotes to meeting materials 	<p>Evaluation of effectiveness in FY2019</p> <p>1. Evaluation method* Questionnaire (anonymous) and interview with third-party consultant</p> <p>2. Evaluation process Report to the Board of Directors the results of the third-party consultant's analysis of the aggregated responses (March 2020)</p> <p>Evaluation results</p> <ul style="list-style-type: none"> Overall, the Board of Directors was found to generally function effectively. FY2019 initiatives were found to be resulting in improvement. 	<p>Main recommendations and issues in FY2019</p> <p>1. Composition of the Board of Directors</p> <ul style="list-style-type: none"> Increase diversity <p>2. Enhance discussion of focus items</p> <ul style="list-style-type: none"> Set agenda more appropriately Set order of priority for important agenda items and improve balance of allotted discussion time, etc. <p>3. Further strengthen monitoring functions</p> <ul style="list-style-type: none"> Role and function of Outside Directors

* Evaluation items including: (1) Composition of the Board of Directors; (2) Administration of the Board of Directors; (3) Enhancement of discussions at meetings and reinforcement of the monitoring function of the Board of Directors; (4) Systems for providing support, including information provision, to Outside Directors; (5) Own initiatives; and (6) Evaluation, etc., of previous fiscal year's improvement measures. Space provided for free comment.

Corporate Governance

Management Council

Highest executive-level decision-making body

In July 2015, the Management Council was reorganized to become the highest executive-level decision-making body, with the aim of enabling decisions that take into account diverse opinions and multifaceted discussions in regard to specific key matters related to management, within the scope

of the mandate conferred by the Board of Directors.

The Management Council, which meets in principle once a week, consists of the President and Chief Executive Officer, all chief officers of the corporate group, and the general manager of each of the business units.

Audit & Supervisory Board Members and the Audit & Supervisory Board

Enhancement of auditing capabilities

The Audit & Supervisory Board consists of five members: two internal full-time members and three outside part-time members. Of the outside members, two are legal experts with experience, respectively, as Prosecutor-General and President of the Osaka High Court, and the third is a certified public accountant with corresponding knowledge of finance and accounting. All Outside Audit & Supervisory Board Members meet the independence criteria of Tokyo Stock Exchange, Inc. or other relevant body and Sumitomo Corporation's internal standards for independence.

receive reports from subsidiaries on their business operations as necessary.

As a dedicated body to support the work of the Audit & Supervisory Board Members, the Audit & Supervisory Board Members' Administration Department has been established with a staff of four. Audit & Supervisory Board Members are engaged in the personnel evaluation and personnel transfers of the department's staff to ensure the independence of the staff from Directors.

Ensuring audit effectiveness

Audit & Supervisory Board Members investigate the status of the operations and finances of the Head Office and the main business locations by attending meetings of the Board of Directors and other important meetings, receiving reports from Directors and employees on the state of execution of their duties, asking for explanations as necessary, and inspecting important decision-making and other documents. In addition, they actively communicate and exchange information with directors and auditors at subsidiaries, and

Collaboration between the Internal Auditing Department and accounting auditors

To ensure audit efficiency, Audit & Supervisory Board Members interact closely with the Internal Auditing Department, receiving reports on internal audit plans and their results in a timely manner. In addition, Audit & Supervisory Board Members exchange information with and monitor the auditing activities of the accounting auditors through regular meetings. By attending audit review meetings and observing inventory audits with the accounting auditors, the Audit & Supervisory Board Members constantly work to improve audit efficiency and quality.

Initiatives to ensure transparency of business management

Establishment of disclosure policy

To ensure that all stakeholders correctly understand its business management policy and business activities, the Company not only discloses statutorily required information but also actively discloses information on a voluntary basis. Moreover, the Company established the Corporate Disclosure Policy in July 2016.

approximately three weeks prior to each regularly scheduled General Meeting of Shareholders. For the convenience of overseas shareholders, the Company also provides an English-language translation of the notice on our website in advance of sending a Notice of Convocation. This early sending and posting of the Notice of Convocation gives shareholders and institutional investors adequate time to study the content of the agenda items. In addition, the Company streams video of the General Meeting of Shareholders on our website for a period of one year after the close of the meeting. In 2020, live video streaming was provided for shareholders unable to attend on the day.

Measures relating to the General Meeting of Shareholders

The Company sends out a Notice of Convocation to shareholders

For details on the Corporate Disclosure Policy, please visit the following website.
<https://www.sumitomocorp.com/en/-/media/Files/hq/about/governance/detail/disclosurepolicy160701.pdf>



Senior Advisors, Honorary Advisors

The Nomination and Remuneration Advisory Committee is chaired by an Outside Director and is composed, in the majority, of Outside Directors. In May 2019, the senior advisor and honorary advisor system was amended by resolution of the Board of Directors based on the results of deliberation by the Nomination and Remuneration Advisory Committee.

Henceforth, former President and Chief Executive Officers and Chairmen of the Board of Directors shall be appointed as special advisors with a fixed term instead of senior advisors or honorary advisors. Special advisors shall receive compensation commensurate with their duties.

Remuneration of Directors and Audit & Supervisory Board Members

Process for determining executive remuneration

Remuneration of Directors (excluding performance-linked bonus) is resolved by the Board of Directors within the limit resolved at the General Meeting of Shareholders. Upon the resolution of the Board of Directors, the details are deliberated by the Nomination and Remuneration Advisory Committee, an advisory body of the Board of Directors a majority of whose members are Outside Directors, and the results thereof are reported to the Board of Directors as part of our efforts to further enhance transparency and objectivity.

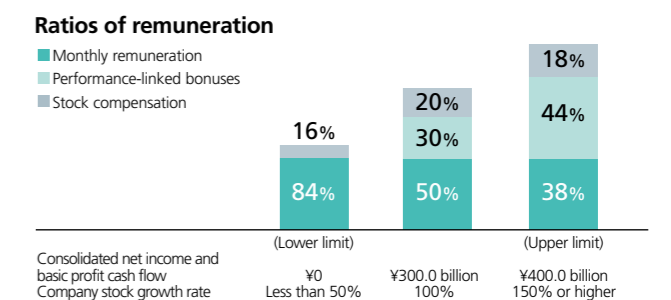
As the degree of linkage with business performance is high for the performance-linked bonus, approval for its award and for the upper limit of the award amount decided by the Board of Directors is obtained each year at the General Meeting of Shareholders. The amount of the award is calculated based on a consolidated results-linked formula decided by the Board of Directors. The award of the performance-linked bonus to the individual corporate officers is decided through individual interview with the President, who reports the result to the Nomination and Remuneration Advisory Committee. The remuneration, etc. of Audit & Supervisory Board Members is deliberated by the Nomination and Remuneration Advisory Committee, and the amount of remuneration to be paid to the respective Audit & Supervisory Board Members is determined based on consultation with the Audit & Supervisory Board Members, within the upper limit resolved at the General Meeting of Shareholders.

increase its corporate value over the medium- to long-term, competitive remuneration levels shall be established.

- By appropriately setting the ratio of fixed remuneration (monthly remuneration) and variable remuneration (performance-linked bonus and stock compensation), the plan shall function as a robust incentive for achieving sustainable growth.
- By focusing on the relationship between the Group's management strategy and the performance-linked bonus, the plan shall promote the execution of duties that coincide with its management strategy and offer strong motivation for achieving specific business objectives.
- By further focusing on the interrelationship with shareholder value regarding the stock remuneration plan, further efforts shall be made to share value with shareholders while promoting the optimization of business portfolios as well as the improvement of corporate value over the medium- to long-term.

Remuneration standards and remuneration composition ratios of executive directors and Executive Officers

- Referring to objective market survey data on remuneration provided by external specialist institutions, appropriate remuneration levels are set after considering the management environment of the Company.
- The composition of the executive director remuneration is set so that, when consolidated net income and basic profit cash flow are at ¥300.0 billion and the Company stock growth rate is 100%, the ratio of monthly remuneration to performance-linked bonus and stock compensation is 50:30:20. Potential scenarios corresponding to various given levels of business performance are illustrated below.



Basic policy and structure of executive remuneration

In order to determine the remuneration, etc. of Directors and Audit & Supervisory Board Members, the Company has formulated the following basic policy, etc. to realize a remuneration plan designed to reinforce the Group's governance and increase its corporate value over the medium- to long-term, and promote the Company's sustainable growth in line with its management strategy.

Basic policy

- In order to retain and acquire superior management personnel who will drive the Group's sustainable growth and

Corporate Governance


Executive remuneration system

● indicates the persons eligible for each type of the remuneration, etc.

Type of remuneration, etc.		Eligibility			
		Executive Directors/ Executive Officers*1	Chairman of the Board of Directors*2	Outside Directors*3	Audit & Supervisory Board Members*4
Fixed	Monthly remuneration	●	●	●	●
	Performance-linked bonuses	●	—	—	—
Variable	Restricted stock-based compensation (Restricted stock)	●	●	—	—
	Performance share unit-based stock compensation (Performance share unit)	●	●	—	—

*1 The remuneration of executive directors and Executive Officers consists of "monthly remuneration," "performance-linked bonus," "restricted stock-based remuneration" and "performance share unit-based remuneration."
 *2 The remuneration of the Chairman of the Board of Directors, whose main role is management supervision as stipulated in the Sumitomo Corporation Corporate Governance Principles, consists of "restricted stock-based remuneration" and "performance share unit-based remuneration," which contribute to improving shareholder value, in addition to "monthly remuneration."
 *3 The remuneration of Outside Directors, who are in a position to supervise management with a high degree of objectivity and independence, consists solely of fixed remuneration ("monthly remuneration"), which is provided on a monthly basis.
 *4 The remuneration of Audit & Supervisory Board Members, who are in a position to audit and supervise management with a high degree of objectivity and independence, consists solely of fixed remuneration ("monthly remuneration"), which is provided on a monthly basis.

For further details on executive remuneration, please visit our corporate website.
<https://www.sumitomocorp.com/en/jp/about/governance/detail/remuneration>



Cross-shareholdings

The Company takes various considerations into account when making decisions about whether to hold shares in other listed companies for purposes other than pure investment. It fully considers issues such as whether the shareholding will lead to medium- to long-term growth in profits as a result of maintaining and strengthening the business relationship with the investee company, from the perspective of investment profit, such as a comparison with the capital cost of individual stocks. Based on the above, the Company reviews the significance of its shareholdings and reports the results thereof to the Board of Directors each year. Where the significance of its shareholdings cannot be confirmed, the Company has a policy of reducing the holding.

The Company also takes various considerations into account under the internal guidelines when making decisions in exercising its voting rights. Having fully considered issues from both quantitative and qualitative standpoints, it adequately exercises voting rights for each agenda based on whether exercising voting rights will lead to enhanced medium- to long-term corporate value at the investee company and the Company and to enhanced value for its own shareholders.

When a company holding the Company's stock for purposes other than pure investment indicates to dispose of its holdings, the Company respects the decision in principle and ensures that their business relationship will not be influenced.

investment management operations.

Furthermore, the Pension Management Committee, which is chaired by the CAO and composed of managers in charge of human resources, finance and accounting organizations, verifies the investment performance and the financial position of pension assets, makes reports to the Management Council and also discloses them to the pension holders.

Benefit pension plans

The Company has adopted a defined benefit corporate pension plan (contract type) and deploys personnel with financial market and investment experience as investment managers to monitor the management of pension assets. When selecting an external asset manager, the Company makes appropriate checks on its investment performance and management structure including governance and continues to periodically monitor these during the

Directors, Audit & Supervisory Board Members, and Executive Officers

(As of June 19, 2020, Executive Officers: As of July 1, 2020)

■ Shares owned in the Company (As of March 31, 2020) ■ Attendance at Meetings of the Board of Directors in FY2019

Directors



Kuniharu Nakamura
 Chairman
 ■ 138,100 shares
 ■ 16/16
Apr. 1974 Entered the Company
Jun. 2012 Representative Director, President and CEO
Jun. 2017 Representative Director, President and Chief Executive Officer
Jun. 2018 Chairman of the Board of Directors (present position)



Masayuki Hyodo
 Representative Director
 ■ 62,700 shares
 ■ 16/16
Apr. 1984 Entered the Company
Jun. 2018 Representative Director, President and Chief Executive Officer (present position)



Toshikazu Nambu
 Representative Director
 ■ 58,100 shares
 ■ 13/13
Apr. 1982 Entered the Company
Apr. 2020 Representative Director, Executive Vice President, General Manager, Media & Digital Business Unit, Chief Digital Officer (present position)



Hideki Yamano
 Representative Director
 ■ 21,452 shares
 ■ 16/16
Apr. 1983 Entered the Company
Apr. 2020 Representative Director, Senior Managing Executive Officer, Chief Strategy Officer and Chief Information Officer (present position)



Takayuki Seishima
 Representative Director
 ■ 24,500 shares
 ■ 13/13
Apr. 1984 Entered the Company
Jun. 2019 Representative Director, Managing Executive Officer, Chief Administration Officer and Chief Compliance Officer (present position)



Masaru Shiomi
 Representative Director
 ■ 14,100 shares
 ■ —
Apr. 1985 Entered the Company
Jun. 2020 Representative Director, Managing Executive Officer, Chief Financial Officer (present position)

Directors, Audit & Supervisory Board Members, and Executive Officers

■ Shares owned in the Company (As of March 31, 2020) ■ Attendance at Meetings of the Board of Directors in FY2019
○ Attendance at Meetings of the Audit & Supervisory Board in FY2019

Outside Directors



Nobuyoshi Ehara
Outside Director
Independent

■ 0 shares
■ 16/16

Sep. 1978 Entered Morgan Guaranty Trust Company
Oct. 1988 Partner, Goldman Sachs & Co. (retired in May 1999)
Jan. 1999 Representative Director, Unison Capital, Inc. (retired in January 2020)
Jun. 2016 Outside Director, Sumitomo Corporation (present position)
Feb. 2020 Partner, Unison Capital, Inc. (present position)



Koji Ishida
Outside Director
Independent

■ 0 shares
■ 16/16

May 1970 Entered The Sumitomo Bank, Limited
Apr. 2004 Representative Director, Senior Managing Director, Sumitomo Mitsui Financial Group, Inc. (SMFG) (retired in June 2005)
Jun. 2005 Standing Corporate Auditor, Sumitomo Corporate Auditor, Sumitomo Mitsui Banking Corporation (retired in June 2006)
Oct. 2007 President, Sumitomo Mitsui Finance and Leasing Co., Ltd. (retired in June 2011)
Jun. 2011 Member of the Policy Board, the Bank of Japan (retired in June 2016)
Jun. 2017 Outside Director, Sumitomo Corporation (present position)
Jul. 2017 Member of the Public Interest Oversight Committee, KPMG AZSA LLC (present position)



Kimie Iwata
Outside Director
Independent

■ 0 shares
■ 16/16

Apr. 1971 Entered the Ministry of Labour (currently Ministry of Health, Labour and Welfare)
Jan. 2001 Director-General of Equal Employment, Children and Families Bureau (retired in August 2003)
Jun. 2008 Representative Director, Executive Vice President, Shiseido Company, Limited (retired as Executive Vice President in March 2012, retired as Representative Director in June 2012)
Jul. 2012 Outside Director, Japan Airlines Co., Ltd. (retired in June 2018)
Oct. 2015 Audit and Inspection Commissioner, the Tokyo Metropolitan Government (present position)
Mar. 2016 Outside Director, Kirin Holdings Company, Limited (retired in March 2019)
Jun. 2018 Outside Director, Sumitomo Corporation (present position)
Jun. 2019 Outside Director, Resona Holdings, Inc. (present position)



Hisashi Yamazaki
Outside Director
Independent

■ 0 shares
■ 16/16

Apr. 1974 Assistant Judge
Feb. 2011 President, Sapporo High Court (retired in March 2013)
Mar. 2013 Commissioner, Japan Fair Trade Commission (retired in December 2015)
Aug. 2016 Attorney at Law (present position)
Jul. 2017 Supervisory Board Member, National Federation of Agricultural Cooperative Associations (present position)
Jun. 2018 Outside Director, Sumitomo Corporation (present position)
Jun. 2018 Outside Director, Tokyo Commodity Exchange, Inc. (retired in December 2019)
Jun. 2020 Outside Director, JAPAN POST INSURANCE Co., Ltd. (present position)



Akiko Ide
Outside Director
Independent

■ 0 shares
■ -/-

Apr. 1977 Entered Nippon Telegraph and Telephone Public Corporation (currently Nippon Telegraph and Telephone Corporation)
Jun. 2012 Executive Director, Director of Information Security, NTT DoCoMo, Inc. (currently NTT DOCOMO, INC.)
May 2013 President and Chief Executive Officer, Radishbo-ya Co., Ltd. (retired in May 2014)
Jun. 2013 Executive Director, Senior Manager in Charge of Commerce Business Promotion, NTT DoCoMo, Inc. (currently NTT DOCOMO, INC.) (retired in June 2014)
Jun. 2014 Full Time Audit & Supervisory Board Member, Nippon Telegraph and Telephone Corporation (retired in June 2020)
Aug. 2018 Audit & Supervisory Board Member, NTT, Inc. (retired in June 2020)
Jun. 2020 Outside Director, Sumitomo Corporation (present position)

Audit & Supervisory Board Members



Michihiko Hosono
Senior Audit & Supervisory Board Member (Full-time)

■ 38,500 shares
■ 13/13
○ 10/10

Apr. 1981 Entered the Company
Apr. 2016 Managing Executive Officer
Apr. 2019 Adviser
Jun. 2019 Senior Audit & Supervisory Board Member (present position)



Toshiaki Murai
Audit & Supervisory Board Member (Full-time)

■ 7,400 shares
■ 16/16
○ 15/15

Apr. 1980 Entered the Company
Apr. 2016 Executive Officer
Apr. 2018 Adviser
Jun. 2018 Audit & Supervisory Board Member (present position)



Haruo Kasama
Outside Audit & Supervisory Board Member (Lawyer)

Independent
■ 13,600 shares
■ 16/16
○ 15/15

Apr. 1974 Public Prosecutor
Dec. 2010 Prosecutor-General (retired in July 2012)
Oct. 2012 Attorney at Law (present position)
Jun. 2013 Outside Audit & Supervisory Board Member, Sumitomo Corporation (present position)
Jun. 2013 Outside Director, JAPAN POST HOLDINGS Co., Ltd. (retired in June 2016)
Jun. 2016 Outside Audit & Supervisory Board Member, Somp Holdings, Inc. (retired in June 2017)
Feb. 2014 Outside Corporate Auditor, Kewpie Corporation (retired in February 2018)
Jun. 2018 Outside Audit & Supervisory Board Member, Toppan Printing Co., Ltd. (present position)



Toshio Nagai
Outside Audit & Supervisory Board Member (Lawyer)

Independent
■ 0 shares
■ 16/16
○ 15/15

Apr. 1974 Assistant Judge
Mar. 2013 President, Osaka High Court (retired in July 2014)
Sep. 2014 Attorney at Law (present position)
Jun. 2015 Outside Corporate Auditor, Toray Industries, Inc. (present position)
Jun. 2016 Outside Audit & Supervisory Board Member, Sumitomo Corporation (present position)



Yoshitaka Kato
Outside Audit & Supervisory Board Member (Certified Public Accountant)

Independent
■ 0 shares
■ 14/16
○ 14/15

Sep. 1978 Certified Public Accountant (present position)
Aug. 2008 CEO, Ernst & Young ShinNihon LLC (retired from Ernst & Young ShinNihon LLC in June 2014)
Jun. 2015 Outside Corporate Auditor, Sumitomo Chemical Company, Limited (present position)
Jun. 2016 Outside Corporate Auditor, Mitsui Fudosan Co., Ltd. (present position)
Jun. 2016 Outside Audit & Supervisory Board Member, Sumitomo Corporation (present position)

Executive Officers

President and Chief Executive Officer

Masayuki Hyodo

Executive Vice President

Toshikazu Nambu

General Manager, Media & Digital Business Unit, Chief Digital Officer

Senior Managing Executive Officer

Fumihiko Koba

General Manager, Metal Products Business Unit

Shingo Ueno

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

Shoichiro Oka

General Manager, Transportation & Construction Systems Business Unit

Tsutomu Akimoto

General Manager, Infrastructure Business Unit

Hideki Yamano

Chief Strategy Officer and Chief Information Officer

Managing Executive Officers

Kiyoshi Sunobe

President and CEO, Sumitomo Corporation Global Research Co., Ltd.

Hideo Ogawa

General Manager, Internal Auditing Dept.

Daisuke Mikogami

General Manager for East Asia

Masato Ishida

Director, Executive Vice President, Chief Strategy Officer, T-Gaia Corporation

Nobuki Ando

General Manager, Living Related & Real Estate Business Unit

Keiji Tanaka

General Manager for Japan Region; General Manager, Kansai Office

Takayuki Seishima

Chief Administration Officer and Chief Compliance Officer

Masaki Nakajima

General Manager for the Americas

Keigo Shiomi

General Manager for Asia & Oceania

Koji Tamefusa

Assistant CFO, Risk Management

Reiji Morooka

Representative Director, Senior Managing Executive Officer, Sumitomo Mitsui Finance and Leasing Co., Ltd.

Yoshiyuki Sakamoto

Assistant General Manager, Mineral Resources, Energy, Chemical & Electronics Business Unit; General Manager, Planning & Coordination Dept., Mineral Resources, Energy, Chemical & Electronics Business Unit

Masaru Shiomi

Chief Financial Officer

Iehisa Nakamura

General Manager for Europe, Middle East, Africa & CIS

Bin Haga

Assistant General Manager, Media & Digital Business Unit; General Manager, Digital Business Division

Executive Officers

Kei Sato

Assistant General Manager, Living Related & Real Estate Business Unit; General Manager, Food & Agriculture Business Division

Norihiko Nonaka

General Manager, Planning & Coordination Dept., Infrastructure Business Unit

Shinji Nakano

Assistant Chief Administration Officer, Human Resources

Mitsuhiro Takeda

Assistant General Manager for the Americas; Executive Vice President and CFO of Sumitomo Corporation of Americas Group; Executive Vice President and CFO of Sumitomo Corporation of Americas

Shinichi Kato

General Manager, Automobility Business Division

Hirokazu Higashino

General Manager, Planning & Coordination Dept., Living Related & Real Estate Business Unit

Haruo Matsuzaki

General Manager, Mineral Resources Division No. 2

Katsuya Inubushi

General Manager, Steel Products Division

Yoshinori Mukaida

General Manager, Finance Dept.

Hiroyuki Sugai

Assistant CFO, Accounting, Accounting Controlling Dept.

Haruhiko Aritomo

General Manager, Mineral Resources Division No. 1

Eiji Ishida

General Manager, Lease, Ship & Aerospace Business Division

Nobuhiro Yoshida

Assistant General Manager for the Americas; General Manager for South America

Hiroyuki Koike

General Manager, Planning & Coordination Dept., Media & Digital Business Unit

Tomonori Wada

CEO, SUMMIT FRESH PRODUCE LIMITED

Kanji Tojo

Assistant General Manager for Asia & Oceania; Sumitomo Corporation Asia & Oceania Group, President and CEO, PT. Sumitomo Indonesia

Kazunari Sakata

President and CEO, Sumitomo Corporation Global Metals Co., Ltd.

Tsutomu Ozaki

Assistant General Manager for Europe, Middle East, Africa & CIS; General Manager, European Corporate Management Unit in Sumitomo Corporation Europe Group, Sumitomo Corporation Europe Limited

Takashi Yamana

Assistant General Manager for Europe, Middle East, Africa & CIS; General Manager for Europe

Tatsuro Tamura

Director, Managing Executive Officer, SCSK Corporation

Kazumasa Watanabe

General Manager, Media Division

Masahiko Yokohama

Assistant General Manager for East Asia; General Manager, China Metal Products Business Unit in Sumitomo Corporation China Group; General Manager, Sumitomo Corporation (Shanghai) Limited

Hajime Mori

General Manager, Energy Division

Yukihito Honda

General Manager, Tubular Products Division

Kotaro Tameda

General Manager, Corporate Planning & Coordination Dept.

Internal Control


Internal control: Basic principles and system

In order to realize sustainable growth and development for the Sumitomo Corporation Group by enhancing the operational quality of each of the Group companies, we stipulate basic regulations for internal control, develop and conduct appropriate internal control, and access the effectiveness and take action to improve it.

To rationally ensure compliance with laws and regulations throughout the entire Group in relation to business activities,

safeguarding assets against loss, effectiveness and efficiency of operations, and reliability of financial reporting, initiatives are being taken to improve group governance.

A chart showing our internal control system is available on our corporate website.
<https://www.sumitomocorp.com/en/jp/about/governance/scic>



Compliance

Basic policy

The basis for the Sumitomo Corporation Group's compliance is to win the trust of society by practicing the Activity Guideline that states "to comply with laws and regulations while maintaining the highest ethical standards."

Accordingly, we follow our principles of "Compliance as Top Priority," which means compliance takes priority over all activities of the Group and that we must never violate compliance as a result of giving priority to the pursuit of profit, and "Immediate Report," which means, in the event of a compliance problem, employees must report the situation without delay to their line manager and to the relevant department of the corporate group.

To provide a clear understanding of this basic policy, we established the Sumitomo Corporation Group Compliance Policy, and work for its acceptance and full application groupwide through ongoing education and awareness activities.

Compliance management system

Sumitomo Corporation appoints a CCO, who has ultimate responsibility for compliance. Further, the Compliance Committee, which plans compliance measures, includes the general managers not only of the corporate group but also of the business divisions. This system enables measures to be examined in a multifaceted way that takes into account the entire Group.

Speak-Up System

Continuous improvement of the Speak-Up System

In the event of a compliance issue emerging, we operate a Speak-Up System providing direct internal and external hotlines to the CCO in addition to the abovementioned regular organizational reporting lines.

Under this system, the fact and details of the report are maintained in the strictest confidence, and it is ensured that the whistle-blower is not subject to disadvantageous

treatment for making the report. We encourage the use of this system through internal seminars and other activities.

We also ensure that officers and employees of each group company, whether in Japan or overseas, have access to reporting through an operational Speak-Up System.

Initiatives to ensure compliance

Appropriate responses to compliance violations and preventive measures

In the event of a compliance issue emerging, the Legal Department, Legal Compliance Department, and other relevant departments take the lead role in promptly establishing the facts and clarifying the cause, appointing external specialists if necessary. Based on their findings, corrective action is taken, disciplinary sanctions imposed, and measures to prevent recurrence are applied.

The Compliance Committee analyzes compliance violations occurring within the Group, including the number of cases and the preventive measures taken, as reference for future policy measures. The results of the analysis are reported periodically to the Management Council and the Board of Directors. Through this process of repeatedly improving and enhancing such measures, we strive to further encourage thorough compliance throughout the Group.

Continuous education program initiatives

Issues particularly important from a compliance perspective, such as antitrust, security trade control, and anti-bribery/corruption, are explained in the Compliance Manual issued to all officers and employees of Sumitomo Corporation.

Additionally, we provide training consisting of seminars and e-learning programs for new employees, newly appointed general managers, and other personnel grades.

In 2019, all officers and employees attended a harassment prevention seminar, which was made available to employees posted overseas by video streaming.

Anti-bribery/corruption initiatives

The Sumitomo Corporation Group implements strict measures to prevent bribery, inappropriate payments, and all other forms of corruption. Specifically, we have established the Rules for Prevention of Bribery to Public Officials, which regulates the provision to public officials in Japan and overseas of entertainment, gifts, invitations and donations, and the selection of agents. In addition, taking into account revisions to the laws and regulations of each country, and advice from various external specialists, we continuously review our

internal rules and guidelines. Further, we extend these rules and guidelines to overseas offices and group companies, and we also offer ongoing employee education and work constantly to prevent bribery and corruption.

The Sumitomo Corporation Group Anti-Corruption Policy, which summarizes the Group's approach and policies outlined above, sets out the Group's basic principles in this area and explains the Group's anti-corruption system and initiatives, in which we request the understanding and cooperation of business partners and other stakeholders.

Further information on the Sumitomo Corporation Group Compliance Policy, Compliance Management System, Speak-Up System, and Sumitomo Corporation Group Anti-Corruption Policy is available on our corporate website.
<https://www.sumitomocorp.com/en/jp/about/governance/compliance>



Risk management

Basic policy and framework

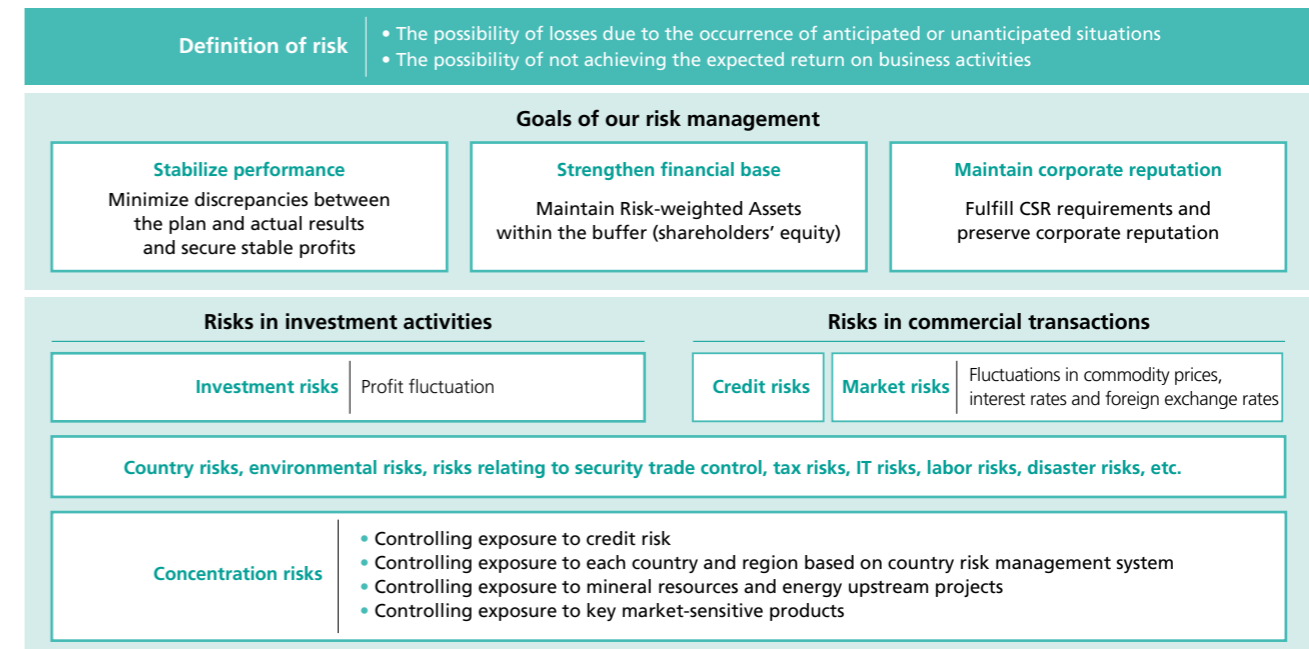
We define "risk" as "the possibility of losses due to the occurrence of anticipated or unanticipated situations," and also as "the possibility of not achieving the expected return on business activities." We have set the following three items as the goals of our risk management activities.

1. Stabilize performance
2. Strengthen financial base
3. Maintain corporate reputation

We categorize our business activities into investments and commercial transactions and manage risk after identifying both common and category specific risk factors. We, by

studying advanced methods and processes, have created an effective risk management framework that anticipates changes in the external environment.

Our goal is to implement the best practice in risk management while maintaining the flexibility to adapt to changes in the business environment. The business environment is continually altering, and new business models that we could never have imagined are emerging on a daily basis. To respond to such situations in a timely and effective manner, we continue to evolve our risk management activities under the leadership of senior management.



Internal Control

Risk management system for investments

Decision-making process for investments

Once an investment has been made the decision to withdraw becomes difficult, and in the event of withdrawal, losses tend to be larger. Therefore, we have adopted a unified framework that covers everything from the entry into the investment to the exit and that takes into account changes in the portfolio as a whole, as well as the nature of the risks involved in each individual investment opportunity, while reviewing the process for assessing and following up investment projects as appropriate.

When assessing investment projects, the investment theme is clarified at the initial stage of the process, and is verified as a key point of due diligence. In addition, by applying a discount rate appropriate to each business risk, we are able to calculate an "appropriate price" for the investment, and evaluate the opportunity from both quantitative and qualitative aspects.

With regard to the decision-making process for investments, the Business Unit Investment Committee or the Company Investment Committee meets at each stage of consideration and implementation, depending on the scale and importance of the project.

From an early stage, these committees conduct in-depth discussions regarding the strategic positioning of the project, the background to and the reasoning behind the selection of the project, and the various factors that may affect the success of the investment.

Execution support and monitoring of investments

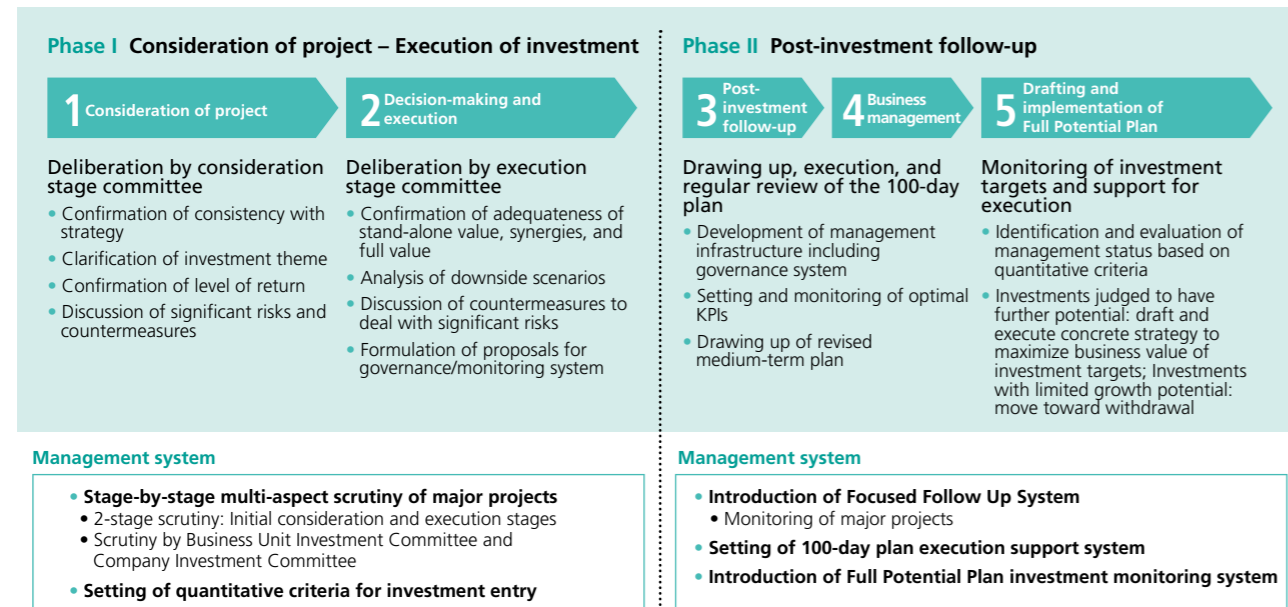
With regard to post-investment execution support, issues are clarified before the decision to invest is made, and a system has been established to work on resolving smoothly any issues that emerge after the investment has been made. For especially important projects, in addition to the "100-day plan*" execution support system, which provides integrated support functions, a "Focused Follow Up System" has been established that consists of plans to improve performance, and following up of project execution, provided by the Company Investment Committee.

In FY2018, we introduced a new "Full Potential Plan" investment monitoring system that is intended to improve the quality of the investment portfolio. Investment targets are evaluated mainly using quantitative indicators, and categorized into "satisfactory," "not satisfactory," and "not good."

After confirming the positioning within the investment portfolio, a further strengths and weaknesses review of business potential is performed. Depending on the outcome of the review, specific measures may be taken to maximize the value of the business in accordance with the growth strategy to increase the value of existing businesses, but withdrawal will be encouraged for businesses with limited room for growth.

* Activities, performed mainly in the first 100 days immediately after the investment has been executed, to construct and develop management infrastructure aimed at drawing up a medium-term plan that seeks to maximize business value, including management of the investment, and which management and financial indicators should be used as targets

Investment risk management framework (Decision-making process for investments / investment evaluation method & execution and management systems)



Information security

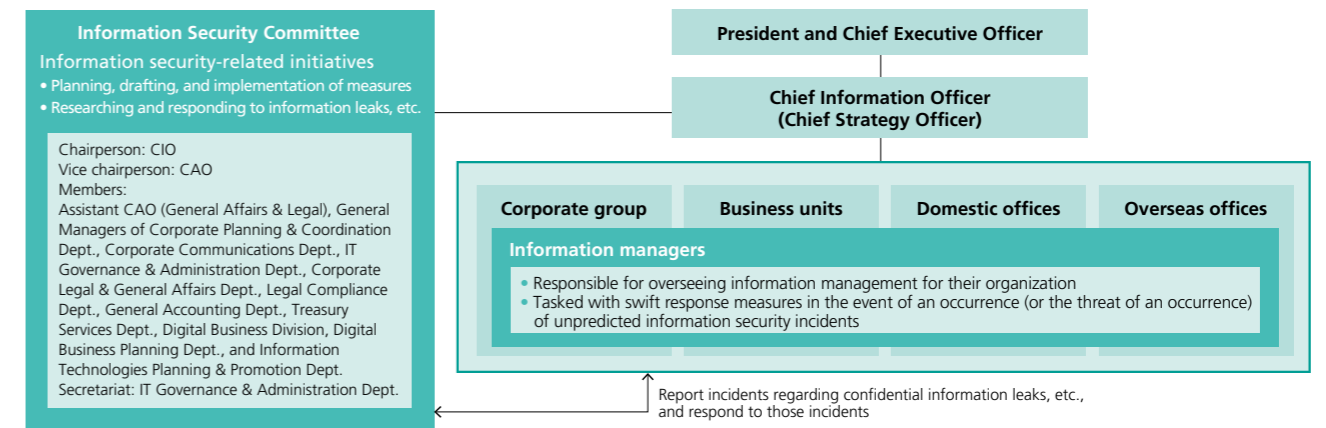
Basic policy and system

Sumitomo Corporation's Information Security Committee, chaired by the CIO, plays the lead role in formulating the Information Security Policy and other relevant regulations as part of its activities to ensure information security and the appropriate management of information assets. For personal information, we operate a Privacy Policy and have put in place relevant regulations and organizational structures to ensure

appropriate protection.

We also take steps to minimize the risk from unexpected situations involving information security, such as external attacks aimed for instance at theft or destruction of corporate information. In addition to system-based safeguards, these include continuous training and drills for officers and employees and system monitoring and upgrades covering our major subsidiaries and other group entities.

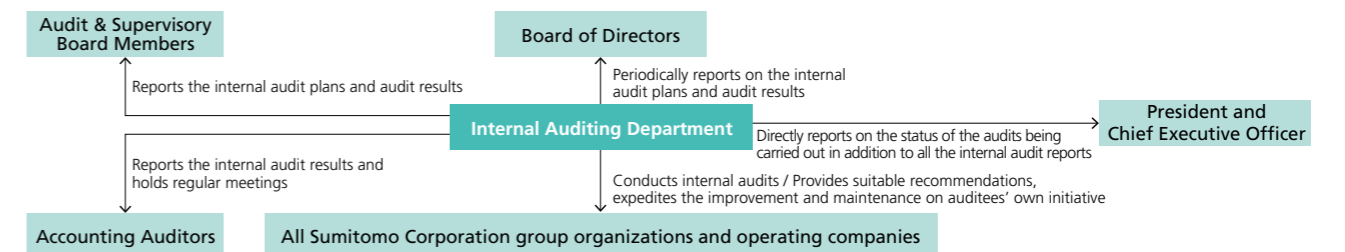
Information management system



Internal audits

The Internal Auditing Department, which reports directly to the President and Chief Executive Officer, is an independent organization that monitors the operations of the entire Sumitomo Corporation Group, and audits all organizations and operating companies of the Group. As well as reporting the outcome of all internal audits directly to the President and Chief Executive Officer, periodic reports are also made to the Board of Directors and the Audit & Supervisory Board Members.

The department conducts audits on all aspects of internal control, comprising asset and risk management, compliance and business operations. Also, by comprehensively examining and identifying the risks inherent in the organization being audited, it provides suitable recommendations based on an evaluation of the effectiveness and adequacy of the internal controls of the organization, thus expedites improvement and maintenance on auditees' own initiative.



Further information on financial reporting and group governance is available on our corporate website. <https://www.sumitomocorp.com/en/jp/about/governance/scic>

Corporate Profile (As of March 31, 2020)

Trade Name	Sumitomo Corporation
Establishment Date	December 24, 1919
Paid-in Capital	¥219.6 billion
Fiscal Year	From April 1 of each year through March 31 of the following year
Number of Consolidated Subsidiaries	663 (Overseas 554, Domestic 119)
Associated Companies [Equity Method]	294 (Overseas 240, Domestic 54)
Total	957
Number of Employees	5,376* (Consolidated Base: 72,642)
Head Office	OTEMACHI PLACE EAST TOWER 3-2 Otemachi 2-Chome, Chiyoda-ku, Tokyo 100-8601, Japan
URL	https://www.sumitomocorp.com/en/jp

* Includes 169 staff employed by Company branches and offices overseas.

Stock Information (As of March 31, 2020)

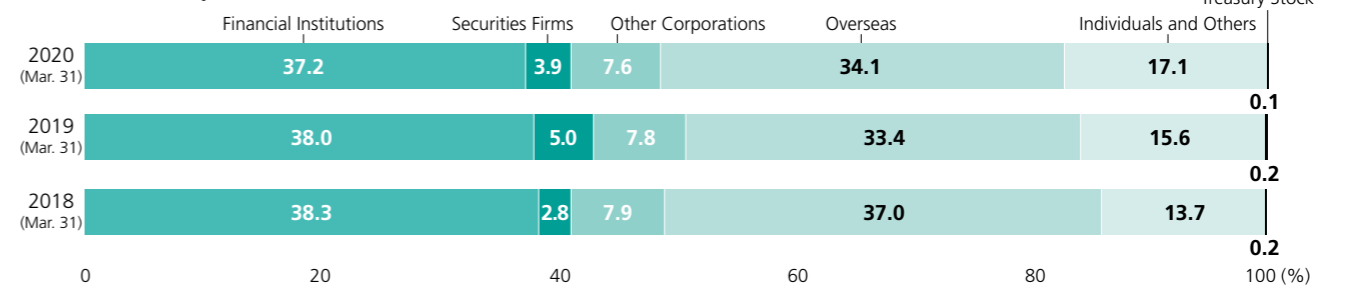
Stock Listings	Tokyo, Nagoya and Fukuoka	
Securities Identification Code	8053	
American Depository Receipts	Ratio	1ADR:1ORD
	Exchange	OTC (Over-the-Counter)
	Symbol	SSUMY
	CUSIP Number	865613103
Depository and Registrar	Citibank, N.A. Depository Receipts Services, P.O. Box 43077, Providence, Rhode Island 02940-3077, U.S.A.	
Overseas Dial-in	1-781-575-4555	
Toll Free Number	1-877-248-4237 (CITI-ADR)	
Number of Issued Shares	1,250,985,467 (including 1,702,929 treasury stock)	
Number of Shareholders	183,064	

Major Shareholders

Rank	Name	Number of Shares (Thousands of shares)	Shareholding Ratio (%)*
1	The Master Trust Bank of Japan, Ltd. (trust account)	109,579	8.77
2	Japan Trustee Services Bank, Ltd. (trust account)	58,183	4.66
3	BNYM RE NORWEST / WELLS FARGO OMNIBUS	55,293	4.43
4	Sumitomo Life Insurance Company	30,855	2.47
5	Japan Trustee Services Bank, Ltd. (trust account 5)	25,306	2.03
6	JP MORGAN CHASE BANK 385151	19,553	1.57
7	Mitsui Sumitomo Insurance Company, Limited	19,000	1.52
8	Japan Trustee Services Bank, Ltd. (trust account 9)	18,726	1.50
9	Japan Trustee Services Bank, Ltd. (trust account 7)	18,413	1.47
10	STATE STREET BANK WEST CLIENT – TREATY 505234	17,385	1.39

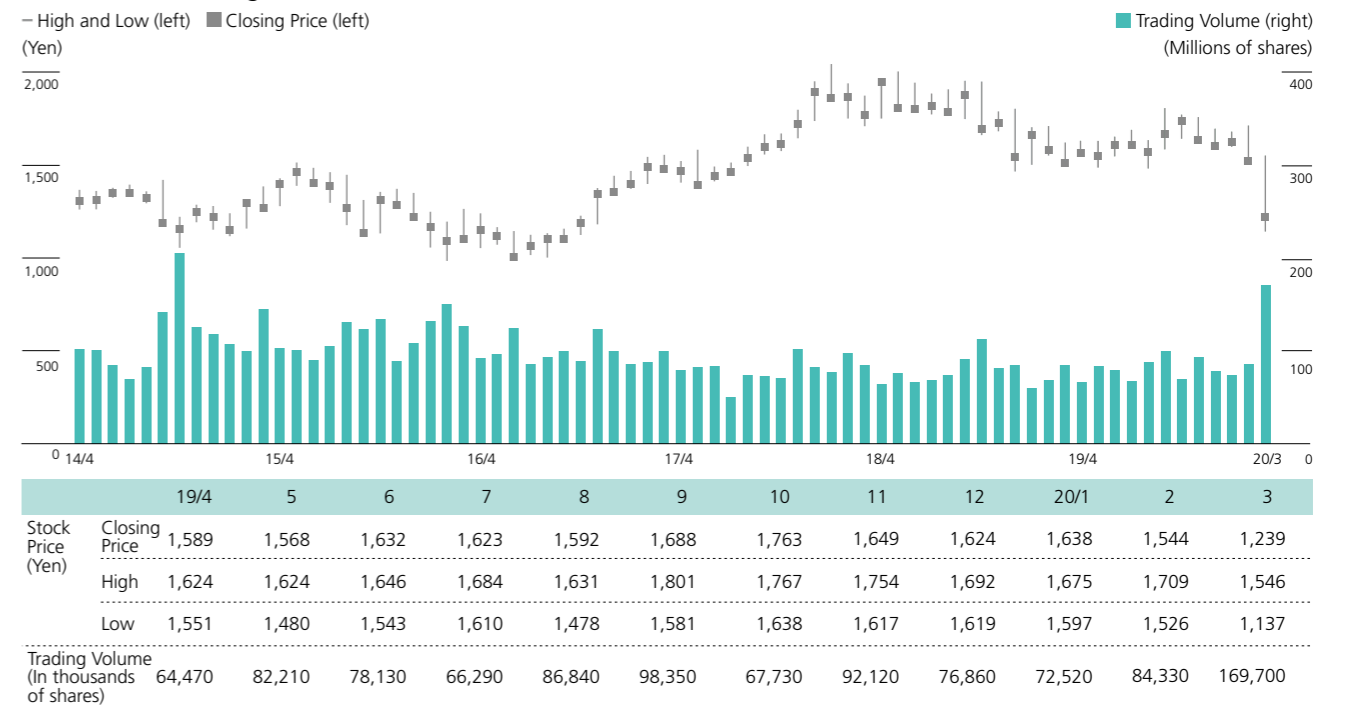
* The shareholding ratio is calculated by dividing the number of shares held by the number of shares outstanding—which is derived by deducting treasury stock (1,702,929 shares) from the total number of issued shares—and rounding to the second decimal place.

Shareholder Composition



* The total of the shareholding ratios may not equal 100% because of rounding to the first decimal place.

Stock Price and Trading Volume*



* The above stock prices and trading volume are based on Tokyo Stock Exchange data.
* The stock prices are rounded to the nearest yen.

Organization (As of April 1, 2020)



IR/SR* Activities (As of March 31, 2020)

We facilitate direct communication with shareholders and other investors, in addition to enhancing disclosure on our website. An executive officer with responsibility for dialogue with shareholders and other investors exercises overall control of and coordinates such IR initiatives shown below. Also, related in-house departments contribute to IR initiatives by distributing information and collecting feedback from shareholders and other investors. Going forward, the Company will continue to increase the transparency of its management, implementing fair

disclosure at all times, integrating financial and non-financial information, and strengthening relationships of trust with shareholders and investors by displaying initiatives to increase the corporate value of the Sumitomo Corporation Group over the medium- to long-term.

* IR: Investor Relations SR: Shareholder Relations

For further details, please visit "Investor Relations" on our website. <https://www.sumitomocorp.com/en/jp/ir>

FY2019 IR/SR Activities

	Apr.	May	Jun.	Jul.	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.
		Announcement of annual results	General Meeting of Shareholders		Announcement of 1st quarter results	Publication of the integrated report		Announcement of semi-annual results			Announcement of 3rd quarter results	
For individual investors					Meetings for individual investors						Online meeting for individual investors	
For analysts and institutional investors			Overseas IR				Overseas SR	Overseas IR				

Number of individual meetings with institutional investors in FY2019

Japan	Overseas			
	Europe	Asia	The Americas	Total
188	35	21	20	66

Number of participants in briefing meetings for individual investors in FY2019

Japan (9 locations in 7 cities)	Online
1,294	1,004

Our range of information disclosure tools

Sumitomo Corporation acts as a single unit using a range of tools to carry out effective information disclosure to all stakeholders. As one of these tools, an integrated report is intended to function as the access point for the full range of disclosure materials, presenting a well-balanced selection of data.

