



Business Principles

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A blue-toned image of the Earth from space, overlaid with a network of glowing white lines and nodes representing global connectivity.

GLOBAL
SPEED
FOCUS

Sumida

Corporate Business Principles

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CUSTOMER FOCUS



COMPETITIVENESS



INNOVATIVENESS



POSITIVE ATTITUDE



GLOBAL MERITOCRACY



LIFE BALANCE



PERSEVERANCE



SOCIAL RESPONSIBILITY

SUMIDA - 60 Years of 'Global, Speed, Focus'

Since our foundation in 1956, Sumida has always prided itself as a company which is able to adapt proactively to changes in our environment. As a result, we have globalized our business activities and management principles. We are a global enterprise comprised of people from various backgrounds and expertise which Sumida values and respects as one of our key strengths.

At the same time, Sumida also recognizes the importance of having a strong value-based company culture. An action or decision of an individual can potentially affect the company or its reputation, so uniting our basic values and commitment to our various stakeholders under a common standard is of utmost importance to maintain our reputation as a responsible, trustworthy and reliable company. Through these we also ensure that we collectively possess the 'genes' of what makes Sumida a success.

This document the 'Sumida Business Principles' outlines the guiding principles of our business practices and management style. It is a guidebook to ensure that everyone understands what is expected from a member of Sumida and, amongst other things, to illustrate what Sumida embodies.

While our Sumida Business Principles will continue to evolve and adapt to a changing world, our basic foundation remains unchanged and reflects the basic ideas of fairness, honesty and social responsibility.

As CEO, I am committed to making sure that our Company is managed according to these basic principles, and commend them to all our employees.

Shigeyuki Yawata

Chief Executive Officer

"Sumida", as used in "Sumida Corporate Business Principles" refers to SUMIDA CORPORATION, its wholly owned subsidiaries and all companies in which rights of management are held.

Our Philosophy

At Sumida we pride ourselves on the global community of knowledge and expertise we have created and developed over the years. With our sales and business development network we have global insight into the needs of the industry, with our focused Business Units we tap into key market segments and with our global manufacturing footprint and diverse production technologies, combined together, we provide our customers with the solutions they need, when and where they need it. This is our collective pride.

With our humble beginnings as a coil manufacturer for transistor radios in Japan, we have grown both in product diversity and in global reach. We now are able to support and supply our services to global customers with a wide range of products which span from basic coil components to more complex value-added modules.

Connecting technology to people

Our vision is to lead in the industry as a timeless company, to provide solutions that help to power and inspire the world with innovations that fulfil the whims of our imagination.

Our mission is to provide our customers with electronic solutions which enable them to develop products and technologies which improve our quality of life - to make life easier, safer, healthier, more pleasurable and more ecological.

Be it in consumer devices, automotive related comfort and safety systems, solutions for a cleaner brighter future, automation or devices to help us with our healthy well being.

We constantly challenge ourselves to be better at what we do and anticipate changes in our environment so that we may adapt quickly and responsibly, maximizing the use of the finest resources at the best locations to meet the needs of our times.

Our attitude towards business operations is to act with the following mantra in mind:

Global · Speed · Focus

Global

To act as a Global One to maximize our company's strengths and business potential as a leader in the global market. All employees operate on the same basic fundamental principles, values and hold the same global standards of best practices.

Speed

Work smart, to be a fast and pro-active company not a reactive one. Be quick to anticipate the needs of our customers. Always strive to respond quickly and efficiently to customer requests. Be fast in producing innovative and competitive new products.

Focus

Performance driven company with clear focus on achieving our goals as times and needs change. Achieving sustainable excellence in business performance and customer focus.

Our Values

These values were established and solidified through various sharing sessions over the years, and are the culmination of values which we found to live within our people. They act as a method of 'self-governance', inspiring employees to align their own actions around a common set of principles regardless of borders and ethnic backgrounds.

Through Sumida Academy we provide a constant reminder of these values so they are instilled into our daily work ethic and so that we live our values.

Customer-Focus

- ▶ Pride in supplying high quality products and solutions to our customers when and where they need them.

Competitiveness

- ▶ Global standards of business ethics and sound business practices.
- ▶ Maximise the effectiveness of our global network of knowledge and experience to achieve sustainable profitable growth.

Innovativeness

- ▶ Strive to continuously improve, aim to anticipate and respond swiftly to changing customer and business needs through continuous learning.

Positive Attitude

- ▶ Deliver our very best in all we do, holding ourselves accountable for results.

Global Meritocracy

- ▶ Take a consistent approach to recruiting and developing our people, regardless of where they are based.
- ▶ Create an environment that fosters respect, sharing and drives high levels of engagement.

Life Balance

- ▶ To work smart and efficiently in order to take a well-balanced approach to life, family and work.

Perseverance

- ▶ Commitment to get results the right way.

Social Responsibility

- ▶ To be responsible members of our company and community.

Management Principles

To realize our mission, we set forth the following seven items as a basic principle of business management and activities.

1. We produce and sell electronic parts used by people throughout the world while quality, efficiency in delivery and cost competitiveness are always recognized world-wide.
2. Our directors and employees respect one another and prioritize the building of strong relationships of mutual trust with our stakeholders.
3. We operate our company with the most suitable locations and employees.
4. We adopt the principle of ability first and do not discriminate based on ethnicity, race, gender, age, belief, religion and/or physical disability.
5. We respect the manners, customs and laws of local regions in all our business activities.
6. As global citizens, we positively participate in environmental conservation.
7. We strive through innovation to develop new products while our management always envisions future generations of technology. We continually challenge ourselves to grow and strive for the better.

Commitment

We promise to our stakeholders the following commitments under our "Management Principles":

1. Customers

- ▶ We consider customer satisfaction perspectives at all times, and endeavor to provide products and services of high quality with speed at appropriate prices.
- ▶ We never forget the presence of our customers, and respond to their requests and questions with sincerity.
- ▶ We set "improvement of customer satisfaction" as the underlying objective to all our activities, and judge all internally proposed policies and plans by its level of contribution to this effort.
- ▶ We establish long-term and prosperous relationships with our clients, while always taking a customer satisfaction perspective.

2. Shareholders

- ▶ We fulfill our responsibilities to our shareholders by increasing corporate value through business activities.
- ▶ We disclose our business activities and performance to our shareholders speedily and accurately.
- ▶ We respect each shareholder's ownership and ensure to maintain fairness among them.

3. Employees

- ▶ We regard our employees as our most important resource, and strive to fully appreciate each person's individual value.
- ▶ We aim to be a borderless, transnational corporation in a true sense; we guarantee fair treatment for our employees at all work locations, and promote teamwork among them.
- ▶ We ensure prohibition of discrimination by ethnicity, race, gender, age, belief, religion and/or physical disability.
- ▶ We assign appropriate and challenging work to employees according to their ability and evaluate and reward them properly.
- ▶ We provide employees with safe, comfortable and productive working conditions so that they can employ their abilities to the full.
- ▶ We continuously develop our human resources, encourage employees to exercise their full potential and create relationships where both the corporation and individual can grow together.
- ▶ Sumida will assist each employee in fulfilling his/her social responsibilities as a citizen.

4. Suppliers

- ▶ We aim to establish stable and friendly long-term relationships with our suppliers on the basis of mutual trust and prosperity.
- ▶ We procure optimum parts, materials, equipment, etc. based on our open door policy and on a fair and free competition basis.
- ▶ We always try to have at least one second source for the sake of risk management.
- ▶ We aim to proactively procure parts, materials, equipment, etc. from companies that have well consideration to the environment.
- ▶ Procurement is carried out in compliance with applicable laws and regulations, and under the terms and conditions set out in Purchasing Contracts.

5. Community

- ▶ We aim to grow in harmony with society through our business activities, and contribute to its development and the overall economy.
- ▶ We firmly recognize the value of corporate citizenship, and aim to become a corporation that is trusted by local communities and society by proactively addressing the local issues around us.
- ▶ Through the Sumida & Ichiro Yawata Foundation, we continually support future generations in which we place our hopes.
- ▶ We uphold "Glocalization" (concurrently both global and local), and respect the practices and cultures of the communities where we conduct business.

6. Other Stakeholders

(1) Local Government/Government Institutions

- ▶ We faithfully comply with the rules and regulations of the countries and regions where we conduct business.
- ▶ We strive to establish and maintain good relations with local governments and the public sector.

(2) Industry Relations

- ▶ We maintain a good and disciplined relationship with other companies in the industry as well as industry organizations.

Code of Conduct

Guideline for Behavior

Sumida's Code of Conduct is a document that illustrates our commitments to all stakeholders as a set of formal written requirements. It embodies our Management Principles and Commitment as defined that govern our corporate activities, formalizes the standards of behavior expected and requested by Sumida and sets the guidelines on how to handle various situations of business dealings.

It reminds us that Sumida is committed to acting with integrity and at the base of our integrity is a set of ethical principles that includes honesty, trust, fairness and respect for others. All of the decisions to be made and actions to be taken on behalf of Sumida must adhere to such standards of integrity and ethical behavior and must comply with all applicable laws, regulations and internal policies. The Code applies to all directors, officers and employees of SUMIDA CORPORATION, its wholly owned subsidiaries, and joint ventures in which Sumida holds a controlling interest.

1. General Standard

1.1. Respect for People and Human Rights

Sumida values its employees as the most important resource and is committed to maintaining an environment of respect for people and human rights in all business activities. We will not tolerate any discrimination on the basis of ethnicity, race, gender, age, belief, religion and/or physical disability.

1.2. Ethics and Business Integrity

Sumida is committed to conducting all business with integrity, in accordance with its business ethics. In our activities, we have our own business principles, that is, pursuit of customer satisfaction, respect for safety, proper environmental management and contribution to the social and economic development of the regions in which we do business, so that we can always ensure trust from all people and societies.

1.3. Compliance with Legal Requirements and Company Policies
Sumida conducts its business activities in a global and diverse environment. We strive to understand and respect diversity and difference of cultures and customs, and comply with all applicable laws and regulations of each country and region in which we operate. All directors, officers and employees of Sumida are requested to comply with all applicable laws and regulations as well as internal company rules and policies with regard to their business activities. All parties are responsible to understand the necessary requirements as applied to one's job. In performing these duties, the Compliance Officer, Legal Department, Internal Auditor and Risk Management Officer are available to provide advice and support to all.

1.4. Commitment to Sincere and Responsible Behavior

All directors, officials and employees are requested to be sincere, reliable and prompt in performing their duties, to contrive to improve operations for rationalization and higher efficiency, and to work with optimum use of physical and intellectual ability in cooperation with others.

1.5. Transparency

As a global company, responsible collaboration needs decisions that are transparent and comprehensible. We put a high emphasis on this transparency in our daily activities as well as when conducting audits and investigations.

2. Employment

2.1. Equal Employment Opportunities

Sumida is committed to providing equal opportunity to all employees and applicants in hiring, training and development without regard to ethnicity, race, gender, age, belief, religion and/or physical disability.

2.2. No Forced Labor/Child Labor

Sumida uses neither form of forced, involuntary, nor child labor (the term 'child' is defined in accordance with the laws of each country or region which stipulate the youngest acceptable age for labor).

2.3. Sound Labor and Employment Practices

Sumida is a transnational company and so we guarantee fair treatment to our employees without regard to their location of work. Teamwork is highly promoted among all employees. We strive to create and maintain a sound, safe and productive environment which is free from discriminative conduct that may result in a hostile atmosphere, so that employees can exert their ability to its full degree. All directors, officers and employees will make an utmost effort to create a fair and sound working environment as well as comply with all applicable laws, regulations, internal rules and policies.

3. Business Integrity

3.1. Prompt Response and Obligation to Notify

In addition to its commitment to daily business activities, Sumida is also committed to responding sincerely, promptly and appropriately to those business and work related emergencies, accidents, irregularities and unexpected events that could be damaging or unbeneficial to our customers or Sumida. All directors, officers and employees are requested to adhere to their obligation to ensure that appropriate action is taken to prevent insincere conduct, inaccurate records, false reporting, etc.

3.2. Gifts and Entertainment

Sumida is committed to conducting business with integrity and fairness and avoiding all unfair and improper dealings. While bribery is a serious criminal offence in many countries, even under circumstances where it is not explicitly prohibited by local law, it is our policy to prohibit any director, officer or employee from making gifts of cash value to our customers, business partners, relevant government officials or other concerned individuals concerned for the purpose of influencing any business activity. The acceptance of cash, gifts or entertainment that may have undue influence to our business decisions is also prohibited. All directors, officers and employees accordingly are committed to abiding by all applicable laws and regulations in each country and region, as well as the internal company rules and policies with regard to their individual business activities.

3.3. Free Competition and Fair Commercial Transactions

Sumida is committed to compliance with all applicable antitrust, competition and fair trade laws, policies and treaties of each country and region in all its business activities and it is prohibited from any conduct restricting competition or unfair business dealing. All directors, officers and employees must know, understand and comply with these laws and are requested to consult with the Compliance Officer or legal council if they are not certain in connection with the legitimacy of business arrangements.

3.4. The Protection of Intellectual Property Rights and Confidential/Personal Information

3.4.1. Compliance of Laws and Regulations & Internal Rules of Each Sumida Company

- (1) All directors, officers and employees are expected and directed to comply with the Law on Protection of Personal Information, and all other applicable laws and regulations with regard to Information Security Management in each country as well as the internal rules of Sumida.
- (2) All directors, officers and employees should recognize the importance of patent right, trademark right, copyright or other intellectual property rights, and are prohibited from infringing such rights.
- (3) All directors, officers and employees should recognize that when they cause any damages to a third party by unauthorized leakage of business information, not only will Sumida suffer the cost of such damages but the responsible person may undertake further obligation to compensate such damage to the company.

3.4.2. Secure Management of Customer Information

- (1) All directors, officers and employees are prohibited from misusing or making illegal copies of particular customer information or any information entrusted by a customer ("Customer Information") without permission.
- (2) All directors, officers and employees are expected and limited to disclosing Customer Information only to those who are permitted to use such information.

(3) All directors, officers and employees are expected and directed to manage and treat Customer Information appropriately complying with the “Trade Secret Management Policy” which sets out information management procedures.

3.4.3. Protection of Personal Information

(1) All directors, officers and employees should respect the private information of individuals such as customers, employees of material suppliers, business partners and themselves; and are requested to appropriately protect such information.

All directors, officers and employees are expected and directed to manage and treat personal information strictly complying with the “Personal Information Management Policy” which sets out information management procedures.

3.5. Recording and Reporting of Accurate Information

All directors, officers and employees are requested to create and maintain all company documents or records such as financial statements to reflect the business activities accurately and fairly. They are also requested to cooperate fully with our internal and external audits or investigations which are conducted in respect of the compliance status and to make accurate reports based on facts.

4. Ethical Personal Conduct

4.1. Insider Transactions

Insider transactions (insider trading, insider dealing and stock tipping) are criminal offenses in most countries where Sumida does business. Insider trading or dealing means personally buying or selling stocks or other securities of any company while in possession of material or price-sensitive non-public information (inside information) about a company through their work. Stock tipping means disclosing inside information about a company to another person such as a relative, colleague or friend that enables that person to buy or sell stock or other securities of the company for a profit on the basis of such information.

Sumida has established standards of conduct for our employees and others who obtain inside information through their work for Sumida. All directors, officers and employees are required to strictly comply with applicable laws as well as the “Rules for Regulation of Insider Trading and Control of Inside Information” which sets out internal policies and procedures for information management and proper dealings that request them to refrain from trading Sumida stock at certain times and under certain conditions. Nonetheless, these policies and procedures are not meant to restrict the freedom of employees to make appropriate personal investments, or each company’s right to legitimately use and disclose inside information in the ordinary conduct of its business.

4.2. Conflict of Interest

All directors, officers and employees should avoid any situation which may lead to an actual or perceived conflict of interest with Sumida. All business activities must be conducted in accordance to the objectives of Sumida, and all business decisions must be made ensuring that any situation which may impair or appear to impair the independence of our judgment is avoided. When such a situation arises, they are required to disclose the relevant information to their supervisors and the Compliance Officer in writing in accordance to the applicable internal policies, and obtain prior authorization before engaging in any further business activities.

Appendix

Corporate Governance Principles

Preamble

Most corporate activities have been undertaken principally with a view to generate revenue and thereby enhance the corporate value to shareholders. In expectance of generating such performance on a continuous basis, it inevitably becomes necessary to motivate and monitor the management accordingly through a framework for disciplining corporate activities, namely corporate governance.

In order to continuously enhance corporate value, SUMIDA COPORATION sets integrity on the foundations of its corporate activity, and prepares the environment in which corporate governance functions effectively.

1. The Rights of Shareholders

For the purpose of fulfilling their responsibilities as the element at the core of corporate governance, shareholders shall be authorized to exercise various rights in managing a company. This should include the right to participate and vote in general meetings of shareholders on major decisions of the company, including elections and dismissals of directors and executive officers, the basic right to share profit and the special right to make derivative lawsuits and injunction of activities in contravention of laws, regulations and other rules. That these rights as established by law should be protected and secured is the underlying condition for the proper function of corporate governance in conjunction with shareholders' awareness of their rights.

SUMIDA CORPORATION will direct its attention to the following issues in order to protect the rights of shareholders:

(1) Respect of Shareholders' Basic Rights

- a. Respect of voting rights
 - ▶ Elect and dismiss the members of the Board of Directors.
 - ▶ Amend the Articles of Incorporation, fundamental corporate changes.

- ▶ Development and improvement of the environment in which shareholders exercise voting rights.
 - ▶ Development and improvement of the environment in which shareholders are inclined to participate in general meetings of shareholders.
 - ▶ Mutual communication with shareholders at the general meetings of shareholders.
 - ▶ Be informed sufficiently ahead of time of the date, location and agenda of General Meetings.
- b. Return of profit to shareholders
 - c. Provide relevant information of Sumida on a regular and timely basis.

(2) Due Consideration to the Infringement of the Rights of Existing Shareholders

- a. Enhanced disclosure of information to shareholders in situations where specified shareholders have excessive control that is not in proportion to the ownership ratio, and the rights of other shareholders are substantially infringed.
- b. Securing fair treatment of and enhanced information disclosure to shareholders in cases where the ownership distribution of the company is, or will be changed.

2. The Equitable Treatment of Shareholders

The equitable treatment of all shareholders of the same class in proportion to their equity interest is an important element of corporate governance. Directors and Executive Officers may find opportunities to abuse their positions to benefit themselves, and such activities are certain to cause disadvantages to investors and minority shareholders. The prohibition of abusive or fraudulent use of corporate assets or insider information by parties closely related to the company is an inevitable step to be taken both to protect investors and to maintain their confidence in the capital markets.

SUMIDA CORPORATION will direct its attention to the following issues in order to secure the equitable treatment of shareholders:

(1) Equal Treatment of All Shareholders of the same Series of a Class

- a. Within any series of a class, all shares should carry the same rights. All investors should be able to obtain information about the rights attached to all series and classes of shares before they purchase.
- b. Processes and procedures for the General Meeting of Shareholders allow for equitable treatment of all shareholders. SUMIDA CORPORATION's procedures are designed to facilitate shareholder voting.
- c. Development and improvement of a system to prohibit transactions against the primary interests of the company or shareholders through the abuse of concerned parties' positions such as directors, officers and employees.

(2) Prohibition of Insider Trading

- a. Specific "black out periods" have been defined for people concerned.

(3) Prohibition of Special Benefits Provided to Specified Shareholders

3. The Duties and Responsibilities of the Board

SUMIDA CORPORATION has separated governance and management, has chosen a "company with committees system" in order to strengthen corporate governance. The Board of Directors and each committee have defined the charter, respectively, and the outline is as follows.

(1) Basic Policy

The Board of Directors' basic policy shall be as follows

- a. To enable the corporation to pursue dynamic management of Sumida through prompt decision making as situations change drastically and ultimately to enhance the corporate value of the whole group.
- b. To realize a better corporate governance structure, for ensuring compliance with laws and regulations and realizing profits for the benefit of shareholders, employees, customers and other stakeholders of SUMIDA CORPORATION.

(2) Guideline of Activities

The Board of Directors shall promptly and boldly exercise its

authority without hesitation, to realize the objectives established by the Sumida Group Charter.

(3) General Responsibility

The Board of Directors shall be responsible for the following matters:

- a. To decide the basic policy for the management of the corporation, design the supervisory structure, and decide other important issues related to the distribution of profits, organization of the corporation and other operational matters.
- b. To supervise status of execution of job responsibilities by Directors and Executive Officers.

(4) Setting up of Committees

The Board of Directors shall set up three (3) committees as per the following, in order to complete the Board of Directors' commitment.

a. Nomination Committee (statutory)

The Nomination Committee's basic function shall be to investigate the candidates for members of the Board of Directors, particularly with respect to the external Directors, as appropriate, for Sumida Corporation, and to prepare and make an annual recommendation to the Board of Directors with respect to the selection of the Executive Officers for each year. This is to ensure that the quality and experience represented by the membership of the Board of Directors is of the highest standard, and in turn, that the Board of Directors' subsequent selection of Executive Officers is also of the highest standard.

b. Audit Committee (statutory)

The Audit Committee's basic function shall be to promote the conduct of management under compliance with laws and regulations throughout the operations of the Sumida Group, through audit of the performance of the company's affairs by the Board of Directors, and by Executive Officers of the corporation and affiliated subsidiary companies, so that Sumida's value is further enhanced.

c. Compensation Committee (statutory)

The Compensation Committee's basic function shall be to resolve the compensation of Directors and Executive Officers, based on the appraisal of the Directors and Executive Officers respective contributions to improvement of the corporation's value.

Each statutory Committee should consist of 3 or more directors. The majority of directors on each statutory committee should be external directors. The Board may, if necessary, establish any other voluntary committee for a specific purpose.

SUMIDA CORPORATION will direct its attention to the following issues to ensure that the Board sufficiently fulfills its responsibilities of management supervision and accountability to shareholders:

- ▶ The Board delegates the management of SUMIDA CORPORATION to the CEO. In order to effectively monitor and supervise management representing the CEO, it is necessary to clearly separate management and governance.
- ▶ Good governance by the Board must encourage and draw out a CEO's effective management. It is necessary to have a system that enhances motivation for the management to maximize corporate value through positive convergence of management and company interests by appropriate means.
- ▶ In order to fulfill their duties and their responsibilities, Board members receive and can request accurate, relevant and timely information.
- ▶ Board members act on a fully informed basis, in good faith, with due diligence and care, and in the best interest of shareholders.
- ▶ Board members provide equal treatment to shareholders in similar situations.
- ▶ Members of the Board and management must disclose any personal interest in any transaction between them and SUMIDA CORPORATION.

4. The Accountability of CEO

- (1) In order to respond quickly and flexibly to the uncertain and rapidly changing environment faced by today's corporation, the CEO should hold the comprehensive authority within the company. The CEO should, under the supervision of the Board, devise high level management strategies, employ creative thinking, and maximize the value of the company over the long term. The CEO shall command other Executive Officers, shall have all authority over operation, and shall take all responsibility.
- (2) In order for a corporation to achieve its objectives, the CEO should set clear goals for corporate performance, and establish a management system that will achieve these goals. The CEO should take the final responsibility for achieving these goals.
- (3) While a CEO's effective leadership is critical to achieving corporate goals, a corporation should not rely only on the individual qualities of the CEO, and the corporation must establish a sustainable management system. The CEO should establish an effective management system and an internal audit system that checks that management system. Both of these systems must be directly under his or her control.
- (4) The CEO should be responsible for making explanations to the Board and each Committee.
- (5) The CEO should maintain close communication through IR activities and general shareholders' meetings, to exercise accountability and maintain the trust of shareholders.
- (6) In order to maintain fair business dealings with stakeholders as well as shareholders, the CEO should obey the law and respect the market principles that are the fundamental pillar of a capitalist economy. The CEO should disclose a wide range of information to all stakeholders. A critical responsibility of the CEO is to maintain the transparency of the corporation through accountability and disclosure.

5. Relationship with Stakeholders in Corporate Governance

Corporate governance for SUMIDA CORPORATION aims to create corporate value through the establishment of smooth relationships between our stakeholders (e.g. shareholders, customers, suppliers, employees) and us and encourage further sound management of the enterprise.

SUMIDA CORPORATION sustains and improves its competitive strengths and enhances its values through the pursuit of profit on a continuous basis. This is a principal interest common to all shareholders, and this is the result of the effort and provision of company resources by all stakeholders. Thus, the establishment of smooth relationships with stakeholders other than shareholders based on active cooperation and constructive criticism are in the long-term interests of SUMIDA CORPORATION.

SUMIDA CORPORATION will direct its attention to the following issues in order to establish smooth relationships with stakeholders other than shareholders:

- (1) Cultivation of a corporate culture that respects the positions of stakeholders.
- (2) Timely and accurate disclosure to stakeholders of material information related to them.

6. Disclosure and Transparency

SUMIDA CORPORATION aims to conduct timely and accurate disclosure regarding corporate activities. Such disclosure is indispensable for appropriate investor evaluation of enterprises in the market, and concurrently for the appropriate exercising of voting rights by shareholders. For this purpose, shareholders require periodic, reliable and comparable information sufficient to evaluate the operational conditions of businesses by the management, and further timely disclosure regarding material events taking place during the intervals between periodic disclosures. Such disclosure shall be conducted simultaneously to ensure equal treatment of shareholders.

SUMIDA CORPORATION will direct its attention to the following issues in order to conduct timely and accurate disclosure:

- (1) Enhanced disclosure of quantitative information on financial conditions and operating results and enhanced disclosure of qualitative information that deepens the understanding of the management conditions of companies by investors
- (2) Securing opportunities for investors to access information equally and easily
- (3) Development and improvement of internal systems to ensure the accuracy and promptness of disclosure
- (4) An audit to be conducted by an independent, competent and qualified auditor

In addition, SUMIDA CORPORATION as a multi-national enterprise putting value in Corporate Governance treats tax governance and tax compliance as important elements of a broader risk management system.

In particular, tax risk management strategies and controls to ensure that the financial and regulatory risks associated with taxation are fully identified and evaluated, are adopted throughout the organization.

The Corporate Governance Principles of SUMIDA CORPORATION refers to “OECD Corporate Governance Principles”, “Principles of Corporate Governance for Listed Companies” issued by the Tokyo Stock Exchange and “JCGR Corporate Governance Principles” issued by the Japan Corporate Governance Research Institute.

Environmental Policy

Sumida has positively embraced environmental protection issues in order to fulfill its social responsibilities as global citizens. Our determination to protect the environment is specified in the “Sumida Environment Philosophy”. Additionally, each local region has established an “Environmental Policy” and promotes environmental protection activities according to the management system of ISO14001.

<<Sumida Environment Philosophy>>

Sumida pledges its commitment to cherishing earth’s irreplaceable natural environment by implementing healthy and continuous policies that positively grapple the issue of environmental protection. We also pledge the efficient use of resources to fulfill our social responsibility as a global citizen by preserving a healthy and natural environment for future generations.

Sumida is committed to :

- ▶ Integrating environmental policies, programs and practices into each business as an element of management in all its functions
- ▶ Developing, designing and manufacturing products taking into consideration the efficient use of renewable resources, the minimization of waste generation, and the safe disposal of wastes
- ▶ Respecting and complying with applicable laws and regulations in local regions concerning environmental issues
- ▶ Improving environmental protection measures relevant to its activities on a continual basis
- ▶ Providing appropriate information, communication and training to elevate internal and external understanding of its environmental commitments and actions
- ▶ Establishing environmental objectives, monitoring progress, evaluating results and defining future actions. These activities ensure the continual improvement in performance of our environmental initiatives

CONTACT

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We are proud members
of Sumida Group

