Company's independent auditors in its internal control auditing report, Sumitomo Rubber Industries attached it to its annual securities report for the fiscal year ended December 31, 2010, as a reference.

Compliance System

Based on compliance with social norms, which are stipulated in the Company's Code of Conduct, Sumitomo Rubber Industries maintains the guideline that corporate activities must adhere to laws and ordinances, social norms and public decency. In addition, the Company strives to increase awareness and ensure strict legal compliance. In order to fulfill its corporate social responsibility, Sumitomo Rubber Industries established the basic objective of complying with laws and its Articles of Incorporation while establishing a strict code of corporate ethics and ensuring sound business operations. To that end, the Company formulated its "Regulations on Corporate Ethics Activities" and established the Corporate Ethics Committee in February 2003. In addition, Sumitomo Rubber Industries set up a compliance counseling room directly controlled by the president as a corporate ethics helpline for employees. This enables the Corporate Ethics Committee to investigate any problems that arise and give sufficient attention to ensuring that those employees who come forward are not penalized. Furthermore, the Company pays close attention to legal aspects, taking advice from a corporate attorney as circumstances demand.

Risk Management System

With regard to a variety of management risks that could exert a significant impact on the Company's business operations, including issues with product quality, legal requirements, the business environment, credit, accidents and disasters, each division and department undertakes an advance analysis of potential risks and formulates appropriate countermeasures, which are discussed at management meetings in accordance with the risk management rules. When considering risk analysis and countermeasure formulation, the Company requests on an as-needed basis advice and instruction from specialists, such as corporate attorneys. For cross-departmental risks, each administration department works in close collaboration with related divisions and departments in their respective areas of operation to conduct Companywide countermeasures.

Furthermore, Sumitomo Rubber Industries established a Risk Management Committee based on its risk management rules. The Risk Management Committee controls Companywide risk management activities and investigates such activities to confirm whether the risk management system is effectively functioning. Should significant risks materialize, or be expected to materialize, the Company president will establish a risk control headquarters based on the risk management rules.

Directors, Corporate Auditors and Executive Officers

(As of March 30, 2011)

Board Of Directors

Chairman and Representative Director	Tetsuji Mino
President and Representative Director	lkuji lkeda
Representative Director and Managing Executive Officer	Takaki Nakano
Representative Director and Managing Executive Officer	Hiroaki Tanaka
Director and Senior Executive Officer	Kenji Onga
Director and Senior Executive Officer	Minoru Nishi
Director and Senior Executive Officer	Yasutaka li
Director and Senior Executive Officer	Hiroki Ishida
Director	Keizo Kosaka
Director	Katsuhide Kurasaka

Corporate Auditors

Corporate Auditor (Full-time) Corporate Auditor (Full-time) Corporate Auditor Corporate Auditor Corporate Auditor Toshiyuki Noguchi Yasuyuki Sasaki Hiroshi Izumitani Tadao Kagono Shintaro Mitake

Executive Officers

Senior Executive Officer Senior Executive Officer Takahiro Fukumoto Kozaburo Nakaseko Masafumi Takami Yutaka Kuroda Yasushi Tanaka Satoru Yamamoto Mitsuteru Tanigawa Naoki Yamada