

Compliance

Basic Compliance Policies

Management positions the strengthening of compliance as a key issue in enabling SMFG to fulfill its public mission and social responsibilities as a global financial group. We are increasing our efforts to ensure that compliance policies are followed properly as we aim to become a truly outstanding global group.

Compliance Management

SMFG seeks to maintain a compliance system that provides appropriate instructions, guidance, and monitoring for compliance to ensure sound and proper business operations across the Group. Measures have been put in place to prevent misconduct and quickly detect inappropriate activities that have occurred to implement corrective measures.

As the holding company, SMFG has established the Compliance Committee, which is chaired by the Group Chief Compliance Officer (Group CCO) responsible for overseeing matters related to compliance. This committee comprehensively examines and discusses SMFG’s various work processes from the perspective of compliance.

In addition, SMFG formulated the Group Compliance Program to provide a concrete action plan for practicing compliance on a group-wide level. SMBC and other Group companies develop their own compliance programs based on the Group program and take other steps to effectively install compliance frameworks.

SMFG discusses and receives reports on compliance-related matters from Group companies, providing suggestions and guidance as necessary to ensure compliance throughout the Group.

Response to Anti-social Forces

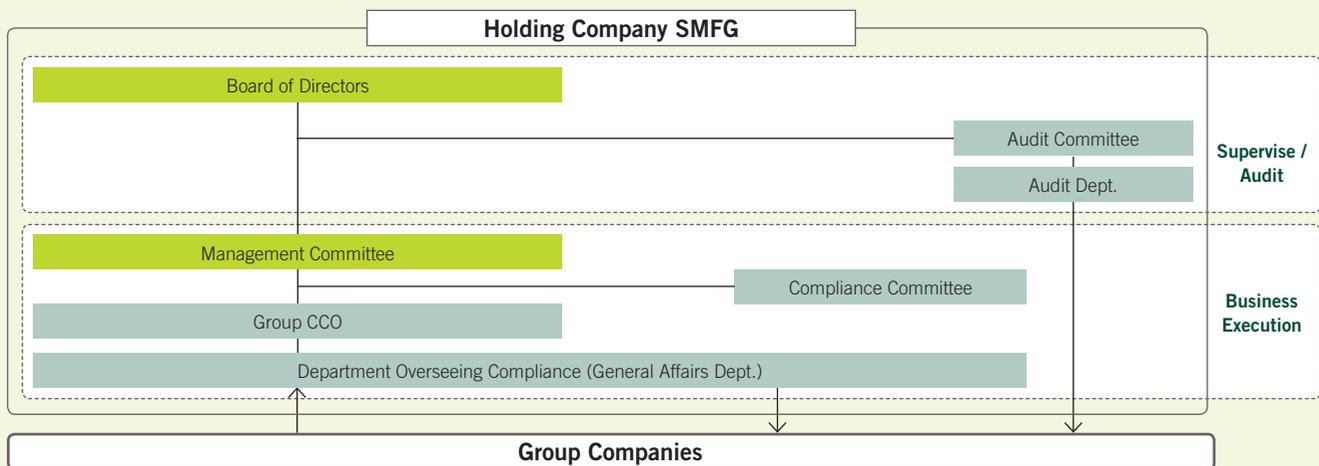
SMFG has set down a basic policy stipulating that all Group companies must unite in establishing and maintaining a system that ensures that the Group allows no relationship whatsoever with anti-social forces or related individuals.

Specifically, the Group strives to ensure that no business transactions are made with anti-social forces or individuals. All contractual documents or terms and conditions must include contracts and terms of transactions clauses regarding the exclusion of anti-social forces from any business relationship, and in the event that it is discovered subsequent to the commencement of a deal or trading relationship that the opposite party belongs to or is affiliated with an anti-social force, we undertake appropriate remedial action by contacting an outside institution specializing in such matters.

Basic Policy for Anti-Social Forces

1. Completely sever any connections or relations with anti-social forces.
2. Repudiate any unjustifiable claims, and do not engage in any “backroom” deals whatsoever. Further, promptly take legal actions as necessary.
3. Appropriately respond to any antisocial forces as an organization by cooperating with outside professional agencies.

Compliance Systems at SMFG



Customer Information Management

SMFG has established Group policies that set forth guidelines for the entire Group regarding proper protection and use of customer information. All Group companies adhere to these policies in developing frameworks for managing customer information.

SMBC and other Group companies formulate and disclose privacy policies for their measures regarding the proper protection and use of customer information and numbers. Management systems are established based on these policies.

Internal Reporting Systems and Hotline for Inappropriate Accounting and Auditing Activities

The SMFG Group Alarm Line is intended to promote self-correction through early detection and rectification of actions that may violate laws and regulations. All Group employees can use this internal means of reporting from inside and

outside their company. In addition, SMBC and other Group companies have established internal reporting systems for their employees.

The SMFG Accounting and Auditing Hotline is aimed at strengthening the Group's self-correction function by encouraging early detection and rectification of improper actions relating to accounting, accounting internal controls, and auditing at holding company SMFG and its consolidated subsidiaries. The hotline can be used from inside or outside the Group to report accounting and auditing irregularities.

SMFG Accounting and Auditing Hotline/Designated Dispute Resolution Agencies

SMFG Accounting and Auditing Hotline	Designated Dispute Resolution Agencies
<p>Reports may be submitted by regular mail or e-mail to the following addresses.</p> <p>Mailing address: SMFG Accounting and Auditing Hotline Iwata Godo Attorneys and Counselors at Law 10th floor, Marunouchi Building 2-4-1, Marunouchi, Chiyoda-ku, Tokyo 100-6310</p> <p>E-mail address: smfghotline@iwatagodo.com</p> <ul style="list-style-type: none"> • The hotline accepts any alerts of inappropriate activities concerning accounting and auditing at SMFG or its consolidated subsidiaries. • Anonymous reports are also accepted; however, if possible, providing personal information such as your name and contact information would be appreciated and helpful. • Please provide as much detail as possible for such inappropriate activities. An investigation may not be feasible if adequate information is not provided. • Personal information will not be disclosed to any third parties without your consent, unless such disclosure is required by law. 	<p>For the handling of any complaints received from and conflicts with our clients, SMBC has executed agreements, respectively, with the Japanese Bankers Association, a designated dispute resolution agency under the Banking Act, and the Trust Companies Association of Japan, a Designated Dispute Resolution Organization under the Trust Business Act and Act on Provision, etc. of Trust Business by Financial Institutions and the specified non-profit organization of "Financial Instruments Mediation Assistance Center," one of "Designated Dispute Resolution Agencies" under the Financial Instruments and Exchange Act.</p> <hr/> <p>Japanese Bankers Association: Contact information: Consultation office, Japanese Bankers Association Telephone numbers: (Japan) 0570-017109 or 03-5252-3772 Business hours: Mondays through Fridays (except public and bank holidays) 9:00 am to 5:00 pm</p> <hr/> <p>Trust Companies Association of Japan: Contact information: Consultation office, Trust Companies Association of Japan Telephone numbers: (Japan) 0120-817335 or 03-6206-3988 Business hours: Mondays through Fridays (except public and bank holidays) 9:00 am to 5:15 pm</p> <hr/> <p>Financial Instruments Mediation Assistance Center Contact information: Financial Instruments Mediation Assistance Center Telephone numbers: (Japan) 0120-64-5005 Fax: (Japan) 03-3669-9833 Business hours: Mondays through Fridays (except public and bank holidays) 9:00 am to 5:00 pm</p>