

Internal auditing

1 Basic initiative policy

SuMi TRUST Group believes that establishing an efficient and effective internal auditing system commensurate with the size and nature of its business, the content of laws and regulations that apply to the business, and the type of risks is indispensable to achieve management targets, appropriate legal compliance, financial facilitation, client protection and risk management.

Therefore, with the aim of ensuring the soundness of management by improving and enhancing the business

execution system and the internal management system, SuMi TRUST Holdings and its main group companies have established internal auditing units that are independent of departments involved in business execution and that adequately act as a restraint function. The internal auditing units verify the appropriateness and effectiveness of the business execution system and internal management system, provide comments and recommendations for correcting problems, and follow up on the status of improvement measures.

2 Internal auditing implementation system

(1) Sumitomo Mitsui Trust Holdings

(i) Organization

In addition to establishing Internal Audit Department independent of departments involved in business execution under the Board of Directors, SuMi TRUST Holdings has strengthened the supervisory and control capabilities (governance) with regards to management and business execution departments, by positioning the Internal Audit Department in a direct instruction and reporting relationship with the Audit Committee.

(ii) Functions and roles

The Internal Audit Department formulates an internal audit plan, taking the basic policy on internal audits into account, which dictates the direction to be taken in the development of SuMi TRUST Group's internal auditing system, as well as significant group-wide risks. After receiving the consent of the Audit Committee, the plan is approved by the Board of Directors. The Internal Audit Department reports the results of the internal audit without delay to the President and the Audit Committee, while also analyzing the internal audit results, including those for group companies, and reporting regularly to the Board of Directors.

In addition, the Internal Audit Department, as the

department supervising SuMi TRUST Group's internal auditing, receives consultation from each group company regarding the audit plan, and confirms its consistency with the basic policy on internal audits. The Internal Audit Department carries out internal audits in collaboration with the internal auditing unit of each group company. The role of the Internal Audit Department also includes receiving reports of internal audit results from the group companies, assessing and verifying the internal auditing system and its implementation status at each group company, and providing guidance as necessary.

(2) Group companies

Internal auditing units that are independent of departments involved in business execution have also been established at the main group companies including SuMi TRUST Bank, and conduct internal audits. Each group company has formulated its own internal auditing plan in accordance with SuMi TRUST Holdings' basic policy on internal audits, and the plan is decided upon by each Board of Directors in consultation with SuMi TRUST Holdings.

Results of internal audits are reported without delay to the president, SuMi TRUST Holdings and others, and are also reported regularly to the Board of Directors.

Internal auditing structure of SuMi TRUST Group

