umitomo Bakelite

Environmental Report 2001 (April 1, 2000, to March 31, 2001)



Business Overview

			and the second s		
Company name	Capital		Fiscal 200	0 net sales	
Sumitomo Bakelite Co., Ltd.	¥26.8 billion (as of March 31, 2001)		¥121.5 billion	¥121.5 billion (Non-consolidated)	
President and CEO	Number of stockholders		¥187.2 billion	(Consolidated)	
Isuneo Moriya	15,933 (as of Marc	ch 31, 2001)		· · ·	
Established	 Number of en 				
January 25, 1932	2,329 (as of March				
lanuary 23, 1932	2,329 (as of Warch	131, 2001)			
Product mix by business division		Medical,		Others	
Semiconductor products		construction,		(0.2%)	
Epoxy resin molding compounds		and packaging		Semiconducto	
Liquid resins for semiconductors		products		products	
Carrier tapes for semiconductor packaging		(19.5%)		(31.6%)	
Polyimide adhesive tapes			Fiscal 2000		
Circuitry products and electronic compon	ent materials		Non-consolidate	d	
Epoxy resin copper-clad laminates			sales breakdow	n	
Phenolic resin copper-clad laminates*		Industrial			
Flexible printed circuits		materials			
Industrial materials		(20.3%)			
Phenolic resin molding compounds				Circuitry products and electronic component	
Vinyl resin molding compounds*				materials	
Urea melamine resin adhesives*				(28.4%)	
Industrial phenolic resins					
Formalin					
Precision molded products		(Dilling of you)	t sales		
Precision metal molds	<u> </u>	(Billions of yen) NO	1 30103		
Medical, construction, and packaging	products	200	185.2 192.7	187.2	
Medical equipment					
Medical instruments		150			
Melamine decorative laminates		1	17.1 124.5	121.5	
Vinyl resin sheets Compound sheets		<u> 100 </u>			
	by affiliated companies	50			
Period covered in this report					
Fiscal 2000 (April 1, 2000–March 31, 2001)		0	 ຜ ຫ		
Sites covered		(Fiscal years)	199	200	
Sumitomo Bakelite Co., Ltd.					
		No	n-consolidated net sales	blidated net sales	
	•				
	liated comna-				
same property), Utsunomiya Plant (including affil nies on the same property), Tsu Plant, Basic Re					
imitomo Bakelite Co., Ltd. Amagasaki Plant (including affiliated companies property), Shizuoka Plant (including affiliated com	panies on the		86 86 n-consolidated net sales Consol	00000000000000000000000000000000000000	

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Institute, Kobe Basic Research Institute

Akita Sumitomo Bakelite Co., Ltd.

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A Message from the President

As we move into the 21st century, the state of the environment is becoming society's greatest concern. From last year, fiscal 1999, ended March 31, 2000, there have been greater efforts to enact and enforce environment-related legislation such as "Law Concerning Reporting, etc. of Releases to the Environment of Specific Chemical Substances and Promoting Improvements in Their Management" (PRTR Law) and the regulations to implement it—"Law Concerning Special Measures against Dioxins" and "The Basic Law for Establishing the Recycling-based Society." In April 2001, "Law for Recycling of Specified Kinds of Home Appliances" was enacted subsequent to "The Containers and Packaging Recycling Law," which went into effect the previous year. It can be said that these constitute points of departure toward a society that exerts low environmental impact.

Under the concept of environmental awareness while seeking business growth, Sumitomo Bakelite Co., Ltd., and Group companies have adopted "Society and environment-compatible management" as an important basic policy for its business activities and implemented "Responsible Care" measures that, in every aspect, are mindful of environmental conservation as well as safety and health.

We set up medium- and long-term goals on a Groupwide basis to realize zero emissions as a significant factor in the reduction of environmental impact. We have also been proactive in the development of environment-friendly "Green Products," including epoxy resin semiconductor molding compounds that contain absolutely no environmentally harmful flame retardants (halogen-related, antimony, and phosphorus-related chemicals) and copper-clad insulating sheets for multilayer circuit board laminates.

Responsible Care is a voluntary program for implementing and improving measures to protect safety, health, and the environment in all processes, from development to production, distribution, use, final consumption, and waste disposal, for companies handling chemical substances. We have undertaken communication initiatives and strive to enhance society's trust. The Company has participated in the Japan Responsible Care Council since its foundation in 1995. We began publishing environmental activity reports in 1998, making public disclosure of our related policies and activities. Starting this year, moreover, we introduced environmental accounting in order to ascertain the costs and effects of conservation activities and for the efficient promotion of environmental management.

The Sumitomo Bakelite Group is moving forward actively in overseas development, with the objective of becoming an international blue chip company. By fiscal 2000, we completed the acquisition of ISO 14001 certification for all of our main production plants, including six overseas locations, and are building an environmental management system based on ISO 14001. Our business activity follows both domestic and overseas environmentrelated laws.

In *Environmental Report 2001*, we have aggregated the Group's concepts and specific measures for environmental conservation. Through its publication, we aim to increase the under-

standing of readers on our stance and our continuous efforts in environmental conservation. We welcome your opinions and suggestions.

August 2001

Tsuneo Moriya

Tsuneo Moriya President and CEO



Environmental and Safety Management Policies, Medium- and Long-Term Goals, and Promotional Organization



Environmental and Safety Management Policies

Concept

Sumitomo Bakelite incorporates Responsible Care into every aspect of its corporate activities, and its conduct takes into account environmental conservation and the assurance of safety and health.

Policies

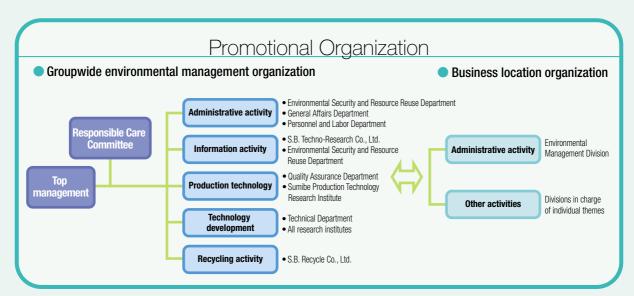
- Carry out assessments concerning safety, health, and the environment from the R&D stage through product waste disposal as well as strive to minimize environmental impact and develop safe product technology
- **2.** Continuously incorporate resource and energy conservation, recycling, and waste reduction into all areas of corporate activity
- 3. Ensure operational safety to protect employees and local residents
- Assure product safety and its safe distribution and provide appropriate information to customers and society
- **5.** Follow laws, regulations, and agreements related to safety, health, and the environment; enact voluntary regulations; and maintain safety, health, and the environment
- Carry out environmental and safety audits and strive to maintain improvement of environmental and safety management

Under our environmental and safety management policies, we set up action plans from fiscal 2000, with fiscal 1999 as the base year, and move forward with Groupwide promotion of medium- and long-term objectives for reducing environmental impact.

Action		Reduction	Medium/long-term goal					
		target	1999	2000	2001	2002	2005	2010
	1. Reduce emissions into the environment For environmental conservation and safety and health maintenance, reduce air emission volume by restricting use and promoting collection of solvents	Emission volume of solvents, etc., into air	Base year	Begin action		60% reduction		
Reduce environmental impact	 Promote energy conservation and CO₂ emission reduction To help prevent global warming and maintain diminishing resources, reduce CO₂ greenhouse gas by promoting energy conservation 	CO ₂ emission volume	Base year	Begin action				6% reduction
leduce environ	3. Promote waste reduction and recycling For effective use of resources and the establishment of a circulating society, reduce waste by improving manufacturing process fields and promoting recycling	Volume of waste material generated	Base year	Begin action		30% reduction	50% reduction	-
Æ	ZERO EMISSIONS 🔶	Volume of waste buried and incinerated externally	Base year	Begin action			Zero	-
Disclosure of environmental accounting				Introduction	Disclosure begins			
"Green" procurement				Begin action				

With respect to environmental impact reduction, action plans, including reduction measures and their respective timetables, were implemented at the Amagasaki, Shizuoka, Utsunomiya, and Tsu plants as well as the Akita Sumitomo Bakelite Co., Ltd. plant. Progress management will be undertaken by ascertaining actual results on a monthly basis.

In addition, action will be taken at other affiliated companies, such as Artlite Industry Co., Ltd., Sano Plastic Co., Ltd., Yamaroku Kasei Industry Co., Ltd., and Kyushu Bakelite Industry Co., Ltd., in pursuit of the above goals.



Environmental Accounting

In fiscal 2000, Sumitomo Bakelite adopted environmental accounting as an effective tool to implement business activities in tune with the environment. Environmental accounting quantifies the results and costs associated with environmental conservation. It is an excellent tool for advancing environment-friendly business activities more efficiently and enhancing the understanding of the Company's efforts through the disclosure of information to stakeholders.

Sumitomo Bakelite decided to adopt environmental accounting after the Ministry of the Environment released "Developing an Environmental Accounting System (Year 2000 Report)" as a guideline in May 2000.

With reference to the guideline, the Company established a framework for quantitatively measuring progress in its activities to reduce its environmental impact. We continue to use this framework in our efforts to evaluate environmental conservation activities based on our own compilation methods.

In fiscal 2000, we first applied environmental accounting to the five plants and two laboratories listed in the following table. From fiscal 2001 onward, we will keep introducing environmental accounting among all of the Group's domestic and overseas subsidiaries and affiliated companies while enhancing the effectiveness of our compilation methods through ongoing reviews and reassessment.

	Environmental co	onservation costs			
Category	Investment (Millions of yen)	Expenses (Millions of yen)	Description		
(A) Emissions reduction	¥ 72	¥ 49	 Ethylene oxide gas emission treatment equipment Factory drain water circulation usage equipment Antivibration construction at activated sludge treatment facilities 		
(B) Energy conservation	64	1	 Steam pipe expansion to integrate boilers Replacement of energy-saving transformers Renovation of methanol sludge boilers 		
(C) Reduction of industrial waste, promotion of recycling, and waste treatment	22	405	Renewal of belt press for sludge dehydrationFacilities for recyclingWaste treatment		
(D) Product evaluation at R&D stage	62	265	 R&D for environment-friendly products Purchase of recycling research facilities		
(E) Green procurement	-	1	Purchase of office supplies in compliance with green procurement standards		
(F) Environmental management	_	137	 Acquisition and maintenance of ISO 14001 certification Efforts in environmental education Personnel cost for environmental management activities 		
(G) Contributions to social activities	15	62	 "Greenification" activities and maintenance Communication with local communities Pollution burden fund		
(H) Response to environmental damage	_	—			
Total	¥235	¥920			

Environmental conservation costs for fiscal 2000

Period: April 2000 through March 2001

Facilities included above: Sumitomo Bakelite Co., Ltd.

Amagasaki Plant (including affiliated companies on the same property), Shizuoka Plant (including affiliated companies on the same property), Utsunomiya Plant (including affiliated companies on the same property), Tsu Plant, Basic Research Institute, Kobe Basic Research Institute Akita Sumitomo Bakelite Co., Ltd.

Compilation

- The compilation was based on the Company's Environmental Accounting Compilation Guidelines with reference to the Ministry of the Environment's guidelines released in 2000.
- Costs were computed within the scope of expenses exclusively allocated for environmental conservation purposes.
- Among various effects, only economic effects with substantial conclusive evidence were recorded. On the other hand, subjective calculations as risk avoidance effects were excluded in this compilation process.
- Expenses do not include depreciation costs.
- With regard to R&D, environment-related investment and expenses were compiled.
- The reduction in environmental burden was adjusted by the net production valuation (production volume × unit price) in the calculation.

• Effects of environmental conservation for fiscal 2000

Decrease (increase) in environmental burden (Compared with previous fiscal year)		Environmental burden (Fiscal 2000)	
Reduction in atmospheric emissions of solvents and others	233 tons	Atmospheric emissions of solvents and others	3,307 tons
Reduction in CO_2 emissions	2,275 tons	Carbon dioxide emissions	114,029 tons
Increase in industrial waste generated	545 tons	Industrial waste generated	11,587 tons
Waste reduction in landfill and external incineration	129 tons	Waste sent to landfill and external incineration	3,843 tons

Economic effects for fiscal 2000

Category	Amount (Millions of yen)
(1) Cost reduction due to energy conservation	¥ 48
(2) Income from recycling	44
(3) Cost reduction by circulation of factory drain water	298
Total	¥390

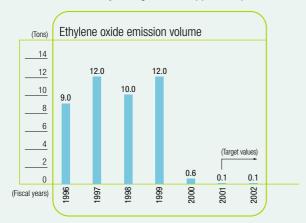
• Total sales of environment-friendly products were ¥1,174 million, accounting for approximately 1.0% of total net sales.

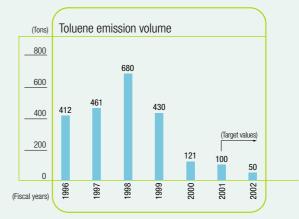
Emissions Reduction and Control of the Environment

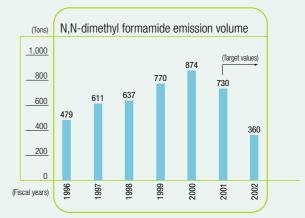
Together with the promotion of Responsible Care in all of its business activities and in concert with local society, Sumitomo Bakelite takes positive measures to preserve the environment and maintain safety and health. In the pages that follow, we introduce environmental impact reduction measures, led by emissions reduction efforts.

Volume of emissions into atmosphere of substances subject to the PRTR Law*

As a member firm of the Japan Chemical Industry Association, we have been complying with the PRTR Law since 1996. In conjunction with the enforcement of the PRTR Law from April 2001, we are taking measures to ascertain emission and transfer volumes and reduce emission quantities. In fiscal 1999, the volume of emissions released into the atmosphere exceeded five tons; the figure for fiscal 2000 and the progress toward our target values are shown in the accompanying graphs. Installation and operation of our exhaust gas processing unit in 2000 enabled an approximate 95% reduction in ethylene oxide emission volume. We continue to study the installation of exhaust gas processing and solvent collection units for N,N-dimethyl formamide. Toluene emission volume is to be cut by changes in the applicable products.







(Tons/vear

Emission and transfer volumes of substances subject to the PRTR Law* (Fiscal 2000 actual results)

						(10115/34
Government	Substance	Volume used	Emission volumes		Volume transferre	
order no.	Gubstanoo	(manufactured)	Into air	Into water	Into soil	as waste matter
1	Water-soluble zinc compounds	49	0	0	0	0
15	Anilines	78	0	0	0	0
25	Antimony and its compounds	110	0	0	0	10
29	Bisphenol A	496	0	0	0	0
30	Bisphenol A type epoxy resin (fluid)	2,239	0	0	0	4.0
42	Ethylene oxides	12	0.6	0	0	0
43	Ethylene glycol	1,043	0	0	0	0
44	Ethylene glycol monoethylate	19	0	0	0	0
45	Ethylene glycol monomethylate	1	0	0	0	0
63	Xylene	41	0	0	0	0
64	Silver and its water-soluble compounds	12	0	0	0	0
67	Cresol	1,408	0	0	0	0
172	N,N-dimethyl formamide	1,083	874	0	0	0.4
176	Organic soot compounds	43	0	0	0	1.6
198	Hexamethylene tetramine	1,449	0	0	0	0
207	Water-soluble copper salts	1	0	0	0	0
227	Toluene	666	121	0	0	1.0
230	Lead and its compounds	61	0	0	0	0
243	Barium and its water-soluble compounds	38	0	0	0	0
266	Phenol	27,339	2.2	0.9	0	6.5
272	Phthalic acid di-2-ethyl hexyl	23	0	0	0	0.4
300	Anhydrous trimellitic acid	16	0	0	0	0
304	Boron and its compounds	2	0	0	0	0
210	Formaldehyde	13,517	0.2	0.3	0	1.2
310	i umaiuenyue	(19,619)	0.2	0	0	0.2
313	Anhydrous maleic acid	2	0	0	0	0
179	Dioxins** (Unit: mg-TEQ***/year)	_	31	0	0	0.6

Based on the PRTR Law, by ascertaining their emission volumes of various harmful chemical substances, companies handling them are urged to improve their own independent controls in order to forestall any hindrances to environmental conservation.

** Dioxins generated during waste incineration

***TEQ (Toxic Equivalents)

This is the toxic equivalent conversion volume of 2,3,7,8 tetrachloride dibenzo dioxin (TCDD), the most harmful dioxin

Smoke and soot volumes

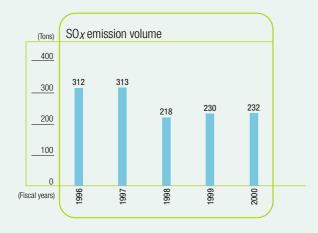
The volume of SO_X and other soot particles emitted by boilers and other installations is steadily decreasing. To maintain and improve this situation, we will strive to select fuels and keep appropriate combustion conditions.

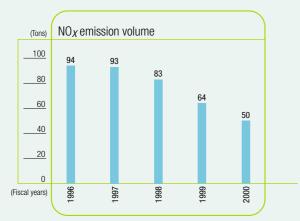
COD

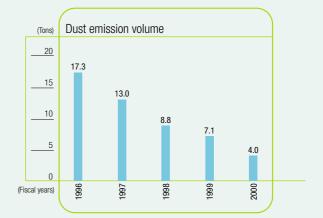
Water effluents are mainly classified as disposal water from operational processes, household use and other sources, and rainwater (including cooling water). Among these, cooling water is basically recirculated. As for disposal water, we operate treatment installations, including high-precision phenol collection units, activated sludge processing units, and neutralizing agglutinate precipitation units (metal disposition) and, with surveillance equipment, have established an ongoing monitoring system in compliance with national wastewater standards and local agreements for pollution prevention.



Activated sludge processing unit









Note: COD: Chemical Oxygen Demand

When the oxidizing agent potassium permanganate oxidizes organic matter in water, it alters the consumable oxygen volume, which is used as an indicator of organic matter pollution in water.

7

Energy Conservation

From the standpoints of global warming prevention and resource protection, the necessity for energy conservation is recognized worldwide. As a corporate citizen, Sumitomo Bakelite is greatly aware of its responsibilities and has taken positive measures since 1993.

At present, we have renewed our goal of reducing the CO_2 emission volume by 6% from the fiscal 1999 level by 2010 and are further promoting energy conservation by the following three means:

① Prevention by all employees against wasteful use of energy

② Promotion of energy-conserving production by rearranged processes

3 Use of new energy conservation and manufacturing method conversion

In fiscal 2000, we reduced the CO_2 emission volume to 1% below the fiscal 1999 level.

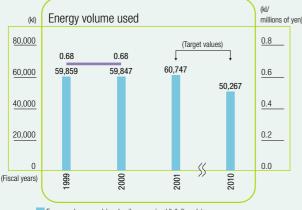
The principal energy conservation measures implemented in fiscal 2000 were:

① Improvement of efficiency through the integration of boilers

② Use of energy-conserving transformers (amorphous transformers)

③ Air conditioner energy reduction with heat-insulating paint on plant building roofs

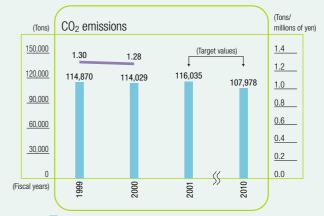
Going forward, we will seek to achieve our target values by proceeding aggressively with the further conversion to energyconserving processes, reclamation of waste heat, introduction of cogeneration systems, and other such means.



Energy volume used (crude oil conversion kl) (left scale) Production valuation base unit (crude oil conversion kl/millions of yen)



Energy-conserving transformer



CO₂ volume generated (CO₂ conversion tons) (left scale) — Production valuation base unit (CO₂ conversion tons/millions of yen)



Heat-insulating paint on plant roof

8

Waste Disposal Reduction and Recycling

To effectively use limited resources and counter serious waste problems, Sumitomo Bakelite makes a significant effort to reduce, reuse, and recycle waste generated at its business locations all over the world. The first step is cutting the volume generated in the manufacturing processes by improving yields, followed in priority by measures aimed at zero emissions. These include the reuse of thermally recycled waste, which was formerly incinerated externally. Unfortunately, in fiscal 2000 we were unable to reduce substantially the volume of waste generated.

Regarding reuse, we have pulverized phenolic resin copper-clad laminates and melamine resin decorative laminates and used the powder as filler in phenolic resin molding compounds as well as re-pelletized waste plastics as raw material. We are presently taking measures for the reuse of buried prepreg glass base material and for segregated collection and reuse of solvents from waste.

To recycle more efficiently, in 1992 we established the subsidiary S.B. Recycle Co., Ltd., whose missions are to research recycling technology and the reuse of by-products and to build waste collection and processing systems for the Group and customers.



Reused Internal intermediate disposal Buried and incinerated externally

Recycling system for phenolic resin molding compounds

Together with the collection of powder generated during molding production, a molding company also generates by-products known as sprue, cull, and runner. A recycling system has been converting these by-products into a base fuel for cement plants.



9

Product Countermeasures at the R&D Stage, "Green" Procurement Activities, and Environmental Management Activities

Product Countermeasures at the R&D Stage

As a world topflight manufacturer, Sumitomo Bakelite supplies epoxy molding compound (EME) for semiconductor packages, phenolic resin copper-clad laminate (PLC), epoxy resin copper-clad laminate (ELC), insulation resin sheet carried on copper foil (APL) for Build Up Multilayer, and epoxy coating powder (ECP) to many semiconductor makers, printed circuit board manufacturers, and electronic components manufacturers. We are continuing to work to completely eliminate substances in certain of these molding compounds that place a burden on the environment, including halogen-related compounds having flame-retardant properties that are contained in laminates and powdered paints, antimony compounds that contain flame-retardant enhancing properties, and lead compounds contained in powdered paint laser coloration agents.

SUMIKON[®] EME for semiconductors

We have developed and are marketing epoxy resin molding compounds for semiconductors by using phosphorus-related chemicals and not using halogen-related and antimony chemicals. With the advent of our "Green Products" SUMIKON[®] EME-G700 series, moreover, retardant-free compounds are now available.

"Green" laminates SUMILITE® PLC, SUMILITE® ELC, and SUMILITE® APL

We have developed and marketed the PLC and ELC "green" laminates by not using halogen compounds and antimony compounds as copper-clad laminates for TV and VCR electrical circuits. For high-precision printed circuit boards, we provide insulation resin sheet carried on copper foil for Build Up Multilayer; these are easy on the environment in that they use neither halogen nor phosphorus compounds.

SUMILITE RESIN® ECP for electronic components

We have developed and marketed lead-free ECP that uses copper and nickel compounds instead of lead compounds. As with SUMIKON[®] EME, we have also brought out and are marketing halogen- and antimony-free ECP that uses phosphorus compounds as flame retardants.

"Green" Procurement Activities

As part of its efforts to reduce its environmental impact, the Company decided in fiscal 2000 to introduce "green" procurement standards for the selection of environment-friendly supplies. Centering on office supplies, this purchasing policy goes into effect in fiscal 2001.

Items		Procurement standard
Paper	Paper for IT-related equipment (PPCs, etc.) Copy paper	Wastepaper content 100%, whiteness 70% or less Wastepaper content 70% or more
Office supplies	Overhead projector film Office envelopes Notebooks	Recycled plastic content 30% or more Wastepaper content 40% or more Wastepaper content 70% or more
Office equipment	Copy machines Printers, fax machines	Standards for electricity conservation, off-mode, double-sided printing Standards for electricity conservation

Environmental Management Activities

ISO 14001-based environmental management system standards are being installed at every business location. To date, eight of the Company's operations in Japan and six overseas have obtained ISO 14001 certification for their environmental management systems.

Year of acquisition	Business or facility
1997	Sumitomo Bakelite Singapore Pte. Ltd., Utsunomiya Plant, Sumitomo Durez Co., Ltd.
1998	Sumicarrier Singapore Pte. Ltd., SumiDurez Singapore Pte. Ltd., Amagasaki Plant, Kyushu Bakelite Industry Co., Ltd., Shizuoka Plant, Tsu Plant
2000	SNC Industrial Laminates Sdn. Bhd., P.T. Indopherin Jaya, Akita Sumitomo Bakelite Co., Ltd.
2001	SB Flex Philippines, Inc., Nippon Denkai, Ltd., Fujieda Plant

In addition, each business location

prepares and implements annual plans for environmental education and emergency training to deal with spills and other similar accidents.

Contributions to Community Activities and Environmental Damage Measures

Contributions to Community Activities



Participation in environmental conservation programs Sumitomo Bakelite hosts seminars on the environment, such as this one discussing ISO 14001 standards, for local environmental conservation councils.





Workplace experience for local junior high school students

A number of students are invited to the Shizuoka Plant annually for hands-on experience as part of their curriculum.



Participation in emergency drills Members of the Amagasaki Plant emergency protection squad participate in local disaster drills.

Donation of Japanese pears Japanese pears harvested from an orchard on the Utsunomiya Plant grounds are given annually to the community.



Participation in a tulip festival Kyushu Bakelite Industry contributes tulips annually to a local festival.

Environmental Damage Measures

Inspections have been undertaken to determine whether there exists groundwater contamination caused by volatile organic compounds (VOC). Inspections took place at the Basic Research Institute, Amagasaki Plant, Shizuoka Plant, Utsunomiya Plant, Tsu Plant, Akita Sumitomo Bakelite Co., Ltd., Artlite Industry Co., Ltd., Sano Plastic Co., Ltd., Yamaroku Kasei Industry Co., Ltd., the former Mukojima Plant site, the former Kyoto Plant site, and the former Kawasaki Plant site. There were no indications of contamination in excess of environmental standards.

Independent Review Report

ANDERSEN

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Independent Review Report on the "Environmental Report 2001"

To the Board of Directors of SUMITOMO BAKELITE CO., LTD.

1. Purpose and Scope of our Review

We have reviewed the "Environmental Report 2001" (the "Environmental Report") of SUMITOMO BAKELITE CO., LTD. (the "Company") for the year ended March 31, 2001. The review consisted of performing certain procedures as described below in relation to the collection, compilation and calculation of the information included in the Environmental Report. As this is the first year of our review, any indicators for years prior to the year ended March 31, 2001 were not subject to these procedures. Our work does not constitute an audit or examination. We therefore do not express an opinion on the accuracy or completeness of the indicators or databases used to compile the information or the representations made by the Company in the Environmental Report.

2. Procedures Performed

We have performed the following review procedures agreed to by the Company's management; 1) Obtained the environmental information supporting the environmental performance indicators and the environmental accounting indicators for the purpose of understanding the processes and the procedures of the Company for collecting the data information used to compile the Environmental Report.

2) With respect to the environmental performance indicators and the environmental accounting indicators in the Environmental Report, tested quantitative accuracy of the indicators on a sample basis and compared them on a sample basis with the supporting data compiled from the information collected by the Company.

3) With respect to the descriptive information in the Environmental Report other than the indicators referred to in the above procedures, interviewed the Company's responsible personnel, made an on-site inspection of a factory and compared such descriptive information with the data collected by the Company or the data found in certain published materials.

3. Results of the Procedures Performed

As a result of the procedures performed;

1) We are not aware of any material modifications that should be made to the environmental performance indicators, or the environmental accounting indicators in the Environmental Report in order for them to comply with the Company's policies and procedures for gathering and reporting such information.

2) We are not aware of any material modifications that should be made to the descriptive information other than the indicators in the Environmental Report to be consistent with the information the Company collected and other information we obtained.

Asahil Co

Tokyo, Japan August 9, 2001

Corporate Data

As of March 31, 2001

Sumitomo Bakelite Co., Ltd.

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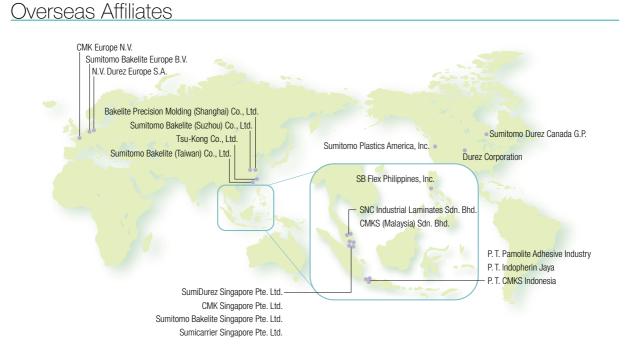
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