

[Translation]

(Exhibit 2)

**Policies on Constructive Dialogue with Shareholders**

1. Sumitomo Heavy Industries, Ltd. (“SHI”) shall actively engage in constructive dialogue with investors, including shareholders, through its investor relations activities.  
  
SHI shall respond appropriately to requests for individual dialogue from shareholders, considering the number of shares they own, the issues they wish to discuss, and the purpose of the talks, among other things. SHI shall conduct a beneficial shareholder identification survey with domestic and foreign institutional investors four times a year to endeavor to understand its shareholder composition and conduct active investor relations activities.
2. The officer in charge of investor relations shall supervise dialogue conducted by SHI with investors, including shareholders, and not only the president and the officer in charge of finance and accounting, but also the SHI Group’s senior management officials, directors including outside directors, or corporate auditors shall participate as appropriate in the dialogue.
3. SHI’s investor relations division shall actively cooperate with relevant divisions in the company through, for example, the preparation of disclosure materials and sharing of necessary information, in order to realize constructive dialogue with investors, including shareholders.
4. In terms of dialogue other than individual discussions, SHI shall conduct financial briefing meetings for investors, financial briefing telephone conferences, briefings on the SHI Group’s business, factory visits, and the like aimed at active dialogue with investors, including shareholders.
5. SHI shall report opinions and concerns that it obtains in its dialogue with investors, including shareholders, as appropriate to a Board of Directors meeting, and give feedback to directors, the management team, and relevant divisions by, for example, distributing reports on such dialogue as necessary, in order to share and utilize the information appropriately and effectively.
6. SHI shall not engage in dialogue with investors, including shareholders, during the silent period from the 16th day of the quarter end month to the announcement of financial reports. For dialogue with investors, including shareholders, where SHI has any insider information, SHI shall manage this appropriately based on the company rules.