[This is an English translation prepared for the convenience of non-resident shareholders. Should there be any inconsistency between the translation and the official Japanese text, the latter shall prevail.]

Overview of Business Contents and Trends in Principal Management Benchmarks

<u>1. Overview of Business Contents</u>

As of September 30, 2010, the main business activities operated by Japan Tobacco Inc. (hereinafter "JT"), its 250 consolidated subsidiaries and 14 companies accounted for by the equity method, and the relationship of each company to the Group's business activities are stated below.

Furthermore, following the application of the "Accounting Standard for Disclosures about Segments of an Enterprise and Related Information" (ASBJ Statement No. 17), effective from April 1, 2010, the disclosure method of JT's segment information was changed, but there were no material changes in the business activities of the JT Group.

Domestic tobacco business

The domestic tobacco business consists of the manufacture and sale of tobacco products.

JT manufactures and sells tobacco products, and TS Network Co., Ltd., conducts distribution-related operations such as distribution of JT's tobacco products and wholesale of foreign tobacco products (imported tobacco products). Japan Filter Technology Co., Ltd., and other subsidiaries manufacture materials.

Major subsidiaries and affiliates

TS Network Co., Ltd., JT Logistics Co., Ltd., Japan Filter Technology Co., Ltd., Fuji Flavor Co., Ltd., JT Engineering Inc.

Besides the companies named above, there are 11 consolidated subsidiaries and 2 companies accounted for by the equity method.

International tobacco business

The international tobacco business consists of the manufacture and sale of tobacco products with JT International S.A. controlling the manufacture and sale as the core company.

Major subsidiaries and affiliates

JT International S.A., JTI-Macdonald Corp., LLC Petro, JT International Germany GmbH, JTI Tütün Urunleri Sanayi A.S., Gallaher Ltd., Austria Tabak GmbH, Liggett-Ducat CJSC

Besides the companies named above, there are 162 consolidated subsidiaries and 6 companies accounted for by the equity method.

Pharmaceutical business

The pharmaceutical business consists of research and development, manufacture and sale of prescription drugs.

JT concentrates on research and development, Torii Pharmaceutical Co., Ltd. manufactures and promotes sales of drugs (including JT's products).

Major subsidiaries and affiliates

Torii Pharmaceutical Co., Ltd., JT Pharma Alliance Co., Ltd., Akros Pharma Inc.

Besides the companies named above, there is 1 consolidated subsidiary.

Foods business

The foods business consists of the manufacture and sale of beverages, processed foods and seasonings.

In the beverages business, JT develops products while JT Beverage Inc., Japan Beverage Inc. and certain other subsidiaries sells them. In the processed foods business and seasonings business, TableMark Co., Ltd. is engaged in manufacturing, selling and other activities.

Furthermore, effective January 2011, a merger will be executed as part of reorganization within the JT Group whereby JT's consolidated subsidiary Japan Beverage Holdings Inc. is the surviving company and JT's consolidated subsidiary Japan Beverage Inc. is the absorbed company.

Major subsidiaries and affiliates

JT Beverage Inc., Japan Beverage Inc., TableMark Co., Ltd.

Besides the companies named above, there are 46 consolidated subsidiaries and 4 companies accounted for by the equity method.

Furthermore, without the reportable segments noted above, JT Group operates business activities relate with real-estate rental, among others. There are subsidiaries and affiliates relate with their business activities (11 consolidated subsidiaries and 2 companies accounted for by the equity method).

2. Trends in principal management benchmarks

Trends in principal management benchmarks regarding the last five business terms

| Term | 21st term | 22nd term | 23rd term | 24th term | 25th term |
|---|---|---|---|---|---|
| Accounting period | From April 1, 2005 to March 31, 2006 | From April 1, 2006 to March 31, 2007 | From April 1, 2007 to March 31, 2008 | From April 1, 2008 to March 31, 2009 | From April 1, 2009 to March 31, 2010 |
| Net sales (Millions of yen) | 4,637,657 | 4,769,387 | 6,409,726 | 6,832,307 | 6,134,695 |
| Ordinary income (Millions of yen) | 297,842 | 312,044 | 362,681 | 307,586 | 255,377 |
| Net income (Millions of yen) | 201,542 | 210,772 | 238,702 | 123,400 | 138,448 |
| Net assets (Millions of yen) | 1,762,511 | 2,024,615 | 2,154,629 | 1,624,288 | 1,723,278 |
| Total assets (Millions of yen) | 3,037,378 | 3,364,663 | 5,087,214 | 3,879,803 | 3,872,595 |
| Net assets per share (Yen) | 919,780.33 | 204,617.68 | 216,707.27 | 162,087.74 | 172,139.61 |
| Net income per share (Yen) | 105,084.78 | 22,001.10 | 24,916.51 | 12,880.90 | 14,451.67 |
| Diluted net income per share (Yen) | - | - | 24,916.26 | 12,879.77 | 14,448.89 |
| Equity ratio (%) | 58.03 | 58.26 | 40.81 | 40.02 | 42.58 |
| Return on equity (ROE) (%) | 12.36 | 11.32 | 11.83 | 6.80 | 8.65 |
| Price earnings ratio (PER) (Times) | 19.70 | 26.32 | 20.03 | 20.33 | 24.08 |
| Net cash provided by (used in) operating activities (Millions of yen) | 150,342 | 435,958 | 145,030 | 275,271 | 320,024 |
| Net cash provided by (used in) investing activities (Millions of yen) | (26,357) | (149,692) | (1,668,634) | (65,008) | (84,057) |
| Net cash provided by (used in) financing activities (Millions of yen) | (48,134) | (32,634) | 519,000 | (217,470) | (250,398) |
| Cash and cash equivalents at end of period (Millions of yen) | 920,141 | 1,179,522 | 215,008 | 167,257 | 154,368 |
| Number of employees [Separately, average number of temporary employees] (Person) | 31,476 [12,187] | 33,428 [10,353] | 47,459 [14,986] | 47,977 [11,736] | 49,665 [11,870] |

(1) Management benchmarks (consolidated)

Notes: 1. Net sales do not include consumption taxes.

2. In the calculation of net assets, the "Accounting Standard for Presentation of Net Assets in the Balance Sheet" (ASBJ Statement No. 5) and the "Guidance on Accounting Standard for Presentation of Net Assets in the Balance Sheet" (ASBJ Guidance No. 8) have been applied since the 22nd term.

3. Diluted net income per share for the 21st and 22nd terms is not presented because there were no potential shares.

4. As the stock split of 5-for-1 was conducted as of April 1, 2006, the share price as of March 31, 2006 was that of ex rights. Accordingly, price earnings ratio for the 21st term was calculated using the share price obtained by multiplying the ex rights share price by the stock split ratio in order to be compatible with net assets per share or the like.

| Term | 21st term | 22nd term | 23rd term | 24th term | 25th term |
|---|---|---|---|---|---|
| Accounting period | From April 1, 2005 to March 31, 2006 | From April 1, 2006 to March 31, 2007 | From April 1, 2007 to March 31, 2008 | From April 1, 2008 to March 31, 2009 | From April 1, 2009 to March 31, 2010 |
| Net sales (Millions of yen) | 2,370,645 | 2,330,453 | 2,302,704 | 2,173,552 | 2,052,654 |
| Ordinary income (Millions of yen) | 192,830 | 189,730 | 177,757 | 160,200 | 161,606 |
| Net income (Millions of yen) | 126,268 | 132,456 | 131,145 | 89,637 | 107,361 |
| Capital stock (Millions of yen) | 100,000 | 100,000 | 100,000 | 100,000 | 100,000 |
| Total number of shares issued (Thousands of shares) | 2,000 | 10,000 | 10,000 | 10,000 | 10,000 |
| Net assets (Millions of yen) | 1,643,098 | 1,753,067 | 1,816,727 | 1,845,443 | 1,901,759 |
| Total assets (Millions of yen) | 2,410,096 | 2,561,865 | 2,902,509 | 2,857,330 | 3,027,503 |
| Net assets per share (Yen) | 857,497.63 | 182,990.92 | 189,616.56 | 192,595.36 | 198,452.58 |
| Cash dividends per share (Yen) [Interim dividends per share] (Yen) | 16,000 [7,000] | 4,000 [1,800] | 4,800 [2,200] | 5,400 [2,600] | 5,800 [2,800] |
| Net income per share (Yen) | 65,839.28 | 13,826.19 | 13,689.35 | 9,356.60 | 11,206.74 |
| Diluted net income per share (Yen) | _ | _ | 13,689.21 | 9,355.78 | 11,204.58 |
| Equity ratio (%) | 68.2 | 68.4 | 62.6 | 64.6 | 62.8 |
| Return on equity (ROE) (%) | 7.96 | 7.80 | 7.35 | 4.90 | 5.73 |
| Price earnings ratio (PER) (Times) | 31.44 | 41.88 | 36.45 | 27.99 | 31.05 |
| Dividend payout ratio (%) | 24.3 | 28.9 | 35.1 | 57.7 | 51.8 |
| Number of employees [Separately, average number of temporary employees] (Person) | 8,855 [1,285] | 8,930 [1,195] | 8,999 [1,209] | 8,908 [1,164] | 8,961 [1,349] |

(2) Filing company's management benchmarks (non-consolidated)

Notes: 1. Net sales do not include consumption taxes.

2. In the calculation of net assets, the "Accounting Standard for Presentation of Net Assets in the Balance Sheet" (ASBJ Statement No. 5) and the "Guidance on Accounting Standard for Presentation of Net Assets in the Balance Sheet" (ASBJ Guidance No. 8) have been applied since the 22nd term.

3. Diluted net income per share for the 21st and 22nd terms is not presented because there were no potential shares.

4. As the stock split of 5-for-1 was conducted as of April 1, 2006, the share price as of March 31, 2006 was that of ex rights. Accordingly, price earnings ratio for the 21st term was calculated using the share price obtained by multiplying the ex rights share price by the stock split ratio in order to be compatible with net assets per share or the like.

5. Cash dividend per share for the 25th term of ¥5,800 includes the 25th anniversary commemorative dividend of ¥200.