

Code of Ethics

Chapter 1 Preamble

Article 1 (Purpose) The company aims to be a global company that contributes to humanity of the world by placing the highest priority on credibility, fairness and respect, and securing continuity of the company on the basis of various ethical values such as transparency and responsibility.

As practicing ethical management is the foundation to achieve the goal, we enact the Code of Ethics to present standards for value judgements and principles for conduct that all employees shall comply with, and pledge to practice them.

Chapter 2 Customer Trust

Article 2 (Customer-oriented)

- ① The company and employees make customer satisfaction and maximization of shareholder value the highest standard for all value judgements and conducts.
- ② The company and employees shall build sound ethical values and perform their duties faithfully through legitimate processes and methods by complying with applicable laws and regulations and basic ethics.

Article 3 (Customer Information Protection)

- ① We shall be clearly aware that we have an obligation to protect customers' personal information and protect it proactively.
- ② We shall be fully aware of laws and regulations related to information protection and put them into practice.

Article 4 (Sincere Service to Customers) We shall perform our duties faithfully based on high level of financial knowledge and accept customer's fair demand and reasonable suggestions proactively.

Chapter 3 Stakeholder Trust (Including Shareholders)

Article 5 (Maintain Trust on Corporate Information) We shall strive to maintain trust with stakeholders including shareholders by recording/managing accounting data according to accounting principles, and disclosing them in a timely manner.

Article 6 (Maintain Political Neutrality) Individuals' rights to vote and their political views shall be respected, however, we shall not infringe political neutrality by making a move to support or expressing opinion in favor of a certain political party or candidate.

Chapter 4 Mutual Trust between Employees

Article 7 (Prohibition of Monetary Transactions) Monetary transactions between employees shall be prohibited since monetary transactions between employees may cause serious losses e.g. the unity of the organization can be undermined due to trust issues.

Article 8 (Prohibition of Forming Private Organizations/Meetings) We shall not form any private organizations or meetings that may undermine harmony in the organization and development of the company.

Chapter 5 Fair Competition in the Market

Article 9 (Fair Competition)

- ① We shall respect the order of the free market economy, and compete with other financial companies including competitors in a fairly manner.
- ② We shall be fully aware of laws and regulations related to fair transaction.

Chapter 6 Fair Transaction with Partners

Article 10 (Fair Contract) We shall carry out a bid, sign a contract or implement a contract fairly in accordance with applicable laws and regulations.

Article 11 (Prohibition of Improper Solicitation) We shall not make any types of

improper solicitations or exert influence e.g. coercing unfair transaction conditions using a superior bargaining power.

Chapter 7 Fair Treatment for Employees

Article 12 (Prohibition of Discrimination)

- ① Employees shall be given fair opportunities based on their capabilities and compensated for evaluation results fairly.
- ② We shall not discriminate against employees based on gender, age, place of origin, educational background, religion, marital status, etc. or give preferential treatments or favors to any individuals.

Article 13 (Nurturing of Talents) We shall support employees fairly in realizing their full potentials by operating various education programs to enhance work expertise.

Article 8 Mutual Respect between Employees

Article 14 (Collaboration) We shall make efforts to create a corporate culture where employees collaborate with each other through smooth communication and proactive cooperation when they work with other teams.

Article 15 (Prohibition of Unreasonable Work Directions) Employees shall not give unreasonable work directions by taking advantage of his/her superior position or relationship, etc. shall not be allowed.

Article 16 (Prohibition of Sexual Harassment/Violence at Work)

- ① We prohibit all behaviors (both verbal and physical) whether online or offline that make a person feel humiliated or disgusted.
- ② Employees shall not commit law violations such as spreading sexual content and taking photos in the workplace.

Article 17 (Prohibition of Workplace Bullying) All types of bullying both online and offline are prohibited including hurting other employees physically or mentally, or degrading the work environment by taking advantage of one's superior position.

Chapter 9 Transparent Transactions with Stakeholders

Article 18 (Transparent Transactions) We shall maintain transparency and ensure mutual benefit in business transactions with all stakeholders.

Article 19 (Prohibition on Acceptance of Gift and Entertainment)

- ① We shall not accept or provide gift or entertainment from stakeholders like our counterparts outside of laws, company regulations and social norms.
- ② When accepting gift, entertainment or other monetary gain under unavoidable circumstances, voluntary reporting is required in accordance with relevant regulations.

Article 20 (Prohibition of Arrogant and Authoritarian Attitude or Actions of People Who Have Positions of Power of Others) We shall think of stakeholders like counterparts as our partner for mutual growth and be prohibited to give unfair business directions, request gift/entertainment and so on.

Chapter 10 Transparent Performance of Duties

Article 21 (Prohibition of Conflict of Interest)

- ① We shall put the company's interests ahead of others when a conflict of interest occurs.
- ② Holding concurrent positions like working in an institution or a company related with our company shall be prohibited in principle. We shall obtain the consent of the company in order to hold concurrent positions and conduct in a transparent manner.

Article 22 (Protection of Company Assets)

- ① We shall use all tangible/intangible assets like physical assets, trade secrets for business purposes only, not for personal use.
- ② We shall use office supplies and company assets in a transparent manner in accordance with usage and procedure defined by the company.

Chapter 11 Employees' Responsibilities for Company

Article 23 (Maintaining Dignity)

- ① We shall act with integrity and maintain dignity not to cause a trouble to the society and to prevent indirect/direct damage to the company.
- ② We shall not distort/fabricate information related to the company and spread or report false facts or rumors.

Article 24 (Reporting Incident/Accident) We shall immediately report to department head and related departments and take appropriate actions when an incident that might cause damage to the company assets or reputation happened or is likely to occur.

Chapter 12 Company's Responsibilities for Employees

Article 25 (Protection of Human Rights) We shall take proactive measures to respect each individual as independent personal entity and protect human rights pursued by the human society.

Article 26 (Secure Work-Life Balance) We shall recognize our employees as precious value of our company and strive to provide a work environment where work-life balance can be achieved.

Chapter 13 Company/Employees' Responsibilities for Society

Article 27 (Sustainable Development) Company and employees shall consider environmental and social issues faced by the human society in the business decision-making process and fulfill our social responsibilities through sustainable management.

Article 28 (Social Contribution) We shall discover social problems faced by our society, and secure & proactively support participation in healthy social activities and volunteering activities.

Article 29 (Environment Protection) We shall recognize the environment as a valuable asset that needs to be shared with our future generations and fulfill our responsibilities to

minimize environmental risks in all business areas.