

## **Introduction**

As a highly public nature company with social responsibilities, Mitsubishi HC Capital Group ("Group") assumes the duty to fulfill those responsibilities proactively. Reaffirming that the trust and confidence given from our customers and society are irreplaceable assets as a cornerstone of our existence, we should conduct our corporate activities with a higher sense of mission and ethics.

From this point of view, we have established the "Mitsubishi HC Capital Group Code of Ethics and Code of Conduct" (collectively "Codes") to share the fundamental values and ethics of the Group and reflect them in our day-to-day operations. Every person engaged in the Group's business is expected to adhere to the Codes, with each top management taking the initiative.

In terms of ethics and legal compliance, there may be some officers and employees who forget about them by working hard or concentrating on their tasks. However, no one can be proud of a company lacking a high sense of ethics, and such a company has no future. In the first place, society never accepts a company that ignores any laws, rules, or norms and turns its back on ethics to seek business interests. A company having no established compliance structure should be driven out of the market.

Given those circumstances, we should re-recognize that the trust and confidence from our customers and society are our property of grave importance. To value them, each Group company is requested to set a compliance manual tailored to its business type based on the Codes. All the officers and employees are expected to make compliance efforts according to the behavioral standards set in that manual. Our continuing challenges will surely build solid trust and confidence in the Group.

Therefore, we expect all the officers and employees of the Group to understand thoroughly and follow the Codes. Through the perseverance of our daily efforts, we are sure that the Group will gain higher credibility at home and abroad, and all of us can be proud of contributing to society as a member of the Group.

Legal & Compliance Department

## **Code of Conduct**

All the officers and employees of the Group are expected to recognize corporate and own responsibilities for the society to fulfill, respectively. We should adhere to the Code of Conduct below with our strict sense of ethics and consciousness for compliance and perform all day-to-day activities with integrity.

[Management's commitment]

Every officer of the Group makes commitments as follows:

To take initiatives to observe the Code of Conduct,

To undertake business management based on corporate ethics and legal compliance,

To build a corporate structure deserving society and people's trust and expectations to contribute to the development of a healthy economy and society, and

To prevent the occurrence of any event or situation violating the Code of Conduct. If such an event or situation occurs, the officers take immediate corrective measures, prevent a reoccurrence, and have all the Group employees completely follow the Code of Conduct.

### **1. Establishing Trust**

(1) Performance of tasks with integrity based on the high ethical value

To facilitate fair and highly transparent corporate activities, all the employees perform their tasks assigned based on high ethical value. No one distorts or hides facts, such as by false reporting.

(2) Strict confidentiality and information management

No one discloses to a third party any customer information learned at work without a good reason or consent from the customer who is the subject of the information in question. Each employee controls and handles the company's information assets, including customer information, with great care, strictly adhering to the relevant internal rules.

(3) Appropriate accounting treatment and information disclosure

No one conducts an inaccurate accounting treatment or makes false or misleading book entries. We disclose company information based on facts with integrity.

### **2. Customer-Oriented Approach**

(1) Sincere and respectful approach to customers

Each employee communicates with customers in a kind, respectful, and sincere manner and keeps a customer-oriented approach not to impair the customer's interests.

(2) Thorough compliance with the principle of suitability and accountability

We offer products and services considered appropriate to the needs and experience of customers. Each employee gives the customer a sufficient explanation of the merits, demerits, and risks before making a deal based on the customer's consent.

(3) Thorough confirmation of customer's intent

When executing a contract with a customer, each employee must affirm that the customer thoroughly understands the contract's content and it is based upon the customer's intent.

(4) Responsible response to stakeholders

We provide information with the highest degree of fairness and transparency to customers and diverse

stakeholders and responsibly respond to them through various forms of communication, such as dialogue with them.

### **3. Strict Compliance with Laws and Regulations**

#### **(1) Compliance with laws and regulations**

We perform fair and sincere corporate activities with strict compliance with laws and rules at the local and international levels as a corporate group operating globally. All employees aim to maintain and enhance high ethical standards and a corporate culture that respects laws and rules.

#### **(2) Prohibition of unfair transactions**

① No employee solicits transactions that use a position of superiority over customers. Also, no one engages in actions that harm any customer's benefits for the sake of the business interests of its own company or Group companies.

② No employee engages in activities to generate own profits based on information learned at work. In particular, no one can trade stocks or securities nor make similar transactions based on non-public material facts that could influence the stock price of any Group company or business partner. When you possess information falling under the category of material facts, you should handle such information with the utmost caution.

③ No employee engages in activities that undermine the interests of another Group company for the sake of its own company's gains. Each employee pays utmost care not to engage in prohibited activities when handling customers' non-public information or conducting transactions with the parent company or another Group company.

④ To maintain fair and unfettered competition, every employee must follow fundamental rules for business transactions, including competition laws both at home and in other countries, and undertake activities strictly adhering to laws and sound corporate ethics.

⑤ No employee permits nor engages in any bribery or corrupt practices. Also, no one offers or accepts a gift or entertainment beyond the bounds of socially accepted limits, and that becomes a hotbed of corruption. Further, we build healthy relationships with governmental and administrative agencies, politicians, and officials to maintain transparency.

#### **(3) National security**

For maintaining international peace and security, we are required to block the flow of money to countries, terrorists, and other suspicious persons who may engage in activities of concern that threaten the safety and security of our home country and international society. Also, we must prevent the above persons from acquiring weapons, goods, and technologies that can be diverted for use in military applications. For that purpose, we cooperate with the international society to control the export and other transactions, and none of us gets involved in such parties.

#### **(4) Respect for intellectual property rights**

We appropriately protect the rights in intellectual properties created by the company (patents, trademarks, copyrights, and other similar rights) and respect the intellectual property rights held by third parties. In addition, each employee recognizes the brand as an essential corporate resource and strives to maintain and increase the value of the Group brand.

#### **(5) Prohibition of mixing business with private affairs**

Every employee makes value judgments from the standpoint of fairness and equity at all times,

regardless of the interests involved. Each employee must draw a line between business and private matters and never makes private use of company assets.

#### **4. Respect for Human Rights and the Environment**

(1) Respect for human rights

Consistent with the fundamental spirit of respect for humanity, no employee engages in any discriminatory action or human rights violation on the ground of gender, sexual orientation, age, nationality, race, ethnicity, political opinion, beliefs, religion, social status, lineage, illness, or disability.

(2) Fostering a comfortable work environment

We aim to realize flexible working styles, respect diversity in values, and develop a work environment and systems that encourage employees to exercise their most entire abilities. In this regard, every employee keeps in mind that sexual, power, or any other harassment hurt people's dignity as human beings. Such an action must be eliminated from the workplace.

(3) Understanding global human rights issues and action to take

Given international standards on human rights, every employee works to respect and not infringe the rights of all persons involved in business activities and create relationships of mutual understanding.

(4) Consideration for the environment

Attaching importance to the conservation of the global environment, every employee pursues harmony with society.

#### **5. Exclusion of Anti-Social Elements/Money-Laundering Prevention**

(1) Exclusion of anti-social elements

Every employee must resolutely address any anti-social element, such as organized crime groups (*boryokudan*) and corporate racketeers (*sokaiya*).

(2) Money-laundering prevention

Every employee pays heed to the possibility that funds transacted through financial institutions are used in various types of crime and terrorism. To prevent money laundering, each must follow, and never skip, the required step to verify a customer's identification; if you find any suspicious transaction that may fall into crime, you should not condone and appropriately address it.