

Compliance

The Group recognizes that the trust and confidence of its customers and society form the foundation of its existence, and places great importance on conducting business activities based on a strong sense of mission and high ethical standards. From this perspective, the Group has established the Mitsubishi HC Capital Group Code of Ethics and Code of Conduct and compliance-related policies, as basic principles for sharing its fundamental values and ethical standards and putting them into practice in day-to-day operations.

Mitsubishi HC Capital Group Code of Ethics and Code of Conduct

Human Rights Policy

Principles for Compliance
with Competition LawsBasic Policy on Anti-social
ElementsPrinciples for Money-Laundering
PreventionPersonal Information Protection
PolicyPrinciples for National
Security Export ControlPrinciples for Prevention of
Bribery and Corruption

Compliance management framework

In the Group, under the leadership of the chief compliance officer (CCO), who has overall responsibility for the compliance management framework, the Legal & Compliance Department plays a central role in planning and operating the compliance management framework. Based on the Code of Ethics and Code of Conduct and various policies, the department provides guidance and supervision to each division and Group company and takes corrective actions in response to violations.

The Group has also established and operates a whistleblowing system through which executives, employees, and others can report or seek consultation on wrongdoings, harassment, and other forms of misconduct. Through this system, the Group works to prevent compliance violations and promote self-correction and improvement. If a compliance violation occurs, our basic response policy is to ensure prompt reporting to top management, fulfillment of social responsibility, prevention of further harm, and thorough prevention of recurrence.

Compliance efforts

We promote adherence to the Code of Ethics and Code of Conduct by preparing a compliance manual that provides concrete explanations of their content and by making it available and known to all Group executives and employees so they can refer to it at any time.

The Group also conducts training to embed integrity (maintaining the highest standards of ethics and constantly returning to the basics), which is our action principle, and annually provides education on and measures levels of understanding regarding various business laws under which the Group is registered or licensed, as well as key compliance priorities. In addition, through periodic monitoring using awareness surveys and self-checks, we work to ensure that these matters are fully understood and adhered to.

Exclusion of anti-social elements and strengthening global financial crime countermeasures

The Group is implementing global financial crime countermeasures, including the exclusion of anti-social elements, prevention of money laundering and terrorist financing, and compliance with economic sanctions.

Furthermore, taking into account changes in the global environment and regulatory trends, the Group is enhancing its customer due diligence (CDD) and customer management framework and utilizing digital technology such as eKYC¹ in line with financial crime risks.

1. eKYC stands for "electronic Know Your Customer" and refers to a mechanism that completes identity verification electronically.

TOPICS

Integrity initiatives in our Group

To promote behavior grounded in integrity, the Group continuously implements integrity initiatives that encourage officers and employees to reflect on questions such as: "What is integrity?", "How can it be practiced?", and "What actions have I taken to demonstrate integrity?" Through training programs and dialogue, these initiatives help employees view integrity as a personal responsibility and foster proactive behavior based on high ethical standards.

