


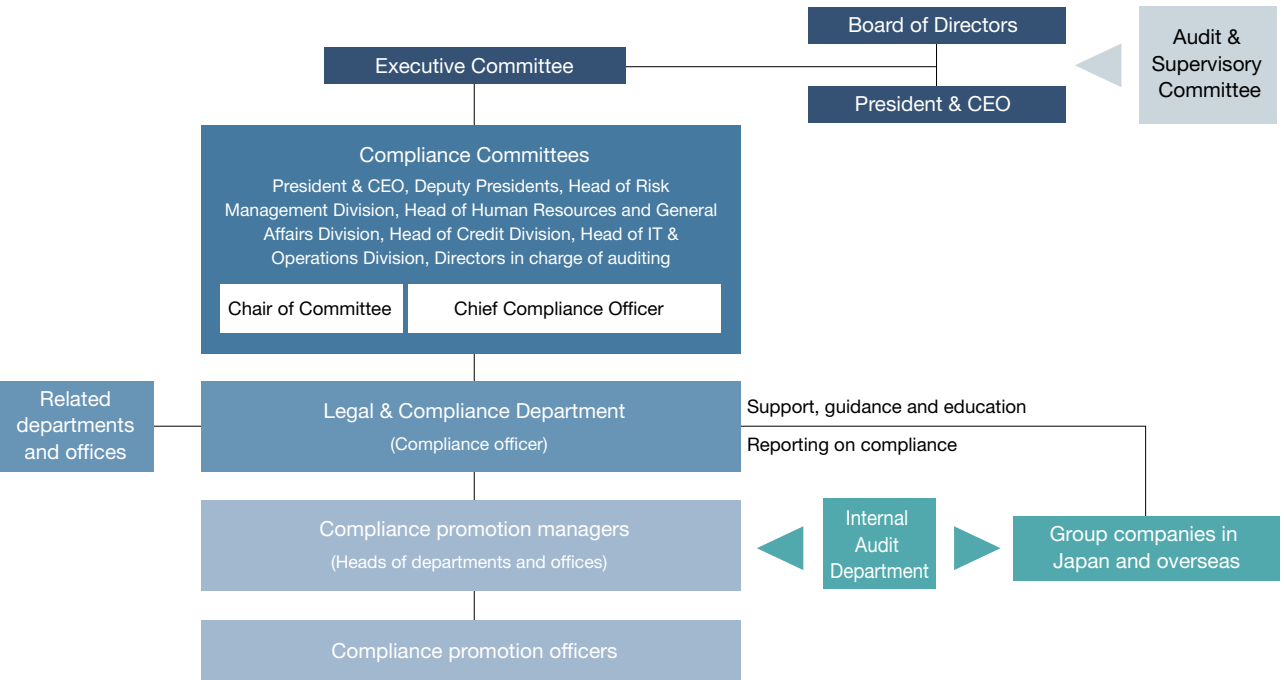
# Compliance

To ensure that our common values and ethics regarding compliance are recognized and shared among all Group employees, the Mitsubishi HC Capital Group has established the Mitsubishi HC Capital Group Code of Ethics and Code of Conduct as basic guidelines for all Group employees. To ensure compliance with this Code of Ethics and Code of Conduct, we have made our Compliance Manual available on the Company intranet so that all Group employees can review it at any time.

## Compliance Management Structure and System

At Mitsubishi HC Capital, the Chief Compliance Officer (CCO) supervises a company-wide compliance management structure and system. Under the leadership of the CCO, the Legal & Compliance Department plans and manages internal structures and systems and provides guidance and supervision to each division and Group company, as well as guidance on the correction of compliance violations.

 Please refer to our website for details.  
**Code of Ethics**  
<https://www.mitsubishi-hc-capital.com/english/sustainability/governance/compliance.html>



## Whistleblowing System

The Mitsubishi HC Capital Group has set up a compliance hotline system as a whistleblowing system for officers and employees to report and consult about misconduct and related issues, including corruption (any real or suspected violations of laws, regulations, internal rules, or the Code of Ethics by officers, employees, etc.).

The compliance hotline system comprises (1) a Legal & Compliance Department contact and (2) a Full-time Audit & Supervisory Committee Member contact as internal points of contact, and (3) an outside attorney and (4) an external consultation desk as external points of contact. These all serve as contact points for officers and employees(including those already retired) to be able to report or consult without hesitation. The external consultation desk also accepts anonymous reports and consultations.

In the event that a compliance violation is brought to light through a hotline or other means, our basic response policy is for the Legal & Compliance Department to ensure prompt reporting to management, the fulfillment of corporate social responsibility, and the prevention of further harm and recurrences. Depending on the nature of the compliance violation, a third-party organization may be involved in the investigation. We strive to investigate the cause of such incidents, formulate and implement measures to prevent recurrences, and further educate employees to raise awareness of compliance.

### What can be consulted or reported

Any acts engaged in by officers and employees in violation or suspected of being in violation of laws, regulations, internal rules, or the Code of Ethics can be consulted or reported.

- Acts affecting the protection of customer interests
- Acts impacting the protection of the environment
- Acts affecting fair competition, such as violations of antitrust laws
- Acts related to provision of bribes or other illegal benefits to government officials and the like both in Japan and overseas
- Other inappropriate acts in violation of laws, regulations, rules, or social justice

Officers and employees who report or consult shall receive no disadvantageous treatment whatsoever due to such reporting or consulting.

## Principles for Money-Laundering Prevention

The Mitsubishi HC Capital Group (“Group”) is striving to enhance our structure and system to prevent money-laundering and terrorist financing (collectively, “Money-Laundering”) and eliminate any trade relationship with persons (individuals and entities) subject to sanctions, which violates economic sanctions of the United Nations, international organizations, and individual countries.

1. We shall comply with all applicable laws and regulations for preventing Money-Laundering in and outside the country.
2. Recognizing Money-Laundering prevention as one of our critical challenges, the top management of each company of the Group shall proactively and aggressively tackle this issue.
3. With regard to persons subject to sanctions identified under the UN Security Council’s resolution and by OFAC or other regulatory authorities, we shall check and screen every contemplated transaction appropriately according to applicable laws and regulations.
4. Taking the risk-based approach, we shall appropriately manage customers and transactions to address the risks in the Money-Laundering.
5. We shall monitor all transactions continually, and if any of them is suspected of being involved in Money-Laundering, we shall report it to relevant authorities as required.
6. We shall provide training programs continuously to maintain and improve awareness about Money-Laundering prevention of the officers and employees of the Group and their capability to deal with those transactions.
7. We shall ensure the appropriate business operation for Money-Laundering prevention by conducting regular internal audits and other processes.