

Basic Policy on Customer-Oriented Business Conduct

As a “Type II Financial Instruments Business Operator,” Mitsubishi HC Capital Inc. (the “Company”) shall thoroughly practice customer-oriented business conduct in the course of implementing Type II Financial Instruments Business, to this end adhering to its Code of Ethics and Code of Conduct.

1. Customer-Oriented Business Conduct

- Each employee shall communicate with customers in a kind, respectful and sincere manner and keep a customer-oriented approach not to impair the customers’ interests.
- All the officers and employees shall remain fully aware of the significance of their social responsibilities, and shall maintain fairness, impartiality and integrity while acting upon the highest professional ethics, thereby practicing customer-oriented business conduct in a thoroughgoing manner.
- Through employee training and other means, we shall ensure that the Code of Ethics, Code of Conduct and the Basic Policy on Customer-Oriented Business Conduct are thoroughly embraced by our officers and employees to serve as guidelines for their judgment and action.

2. Customer-Oriented Approach to the Provision of Services

- We shall offer products and services considered appropriate to the needs and experience of customers.

3. Customer-Oriented Approach to the Provision of Information

(1) Customer-Oriented Provision of Information

- We shall provide customers with an easy-to-understand, meticulous and sufficient explanation with regard to benefits, disadvantages, opportunities and risks arising from their transactional choices. By doing so, we shall ensure that no deal would be signed without the consent of customers who are fully informed about these factors.

(2) Meticulous Provision of Information to Ensure Customers’ Understanding of Products

- In the course of product proposals, we shall provide customers with sufficient information by using easy-to-understand expressions to explain features of products, risks associated with them, service fees required and other essential factors.

(3) Enhancement of Transparency regarding Service Fees, etc. to Help Customers Make Optimal Investment Decisions

- We shall keep our service fee systems transparent to our customers, to this end offering a meticulous explanation of such fees to help them make well-informed investment decisions.

(4) **Appropriate Incentivization for Employees**

- We shall develop education systems to properly train employees in charge of sales to ensure our sales activities serve the interests of our customers and fulfill their needs in a comprehensive manner.
- Having positioned compliance as an important management matter, we shall develop a structure to ensure appropriate employee incentives, as well as a proper governance structure, to pursue the customer's best interests.

4. Appropriate Management of Conflicts of Interest in the Course of Engagement in Type II Financial Instruments Business

We shall accurately assess potential conflicts of interest that may arise from transactions with our customers. In cases where this possibility exists, we shall provide the customer involved with prior notification and otherwise manage the conflict of interest accompanying transactions in an appropriate manner.

Established: April 1, 2021