

Principles for Prevention of Bribery and Corruption

In performing our respective duties, all officers and employees of the Mitsubishi HC Capital Group (“Group”) shall comply with laws and regulations for preventing bribery and corruption (“Anti-Corruption Laws”) applicable in countries and regions where the Group performs business according to the principles below. The Anti-Corruption Laws include the Penal Code, the National Public Service Ethics Act, and the Unfair Competition Prevention Act (all in Japan), the Foreign Corrupt Practices Act (the U.S.), the Bribery Act (the U.K.), and the Bribery & Corruption Laws and Regulations (China). The Group prohibits all officers and employees from offering and receiving any bribes because those acts cause suspicions or distrust from society.

1. Corrupt practice means unlawfully utilizing the power, authority, and status of oneself or a third party in relation to one's job duties. It includes bribery, embezzlement, obstruction of justice, coercion of payoffs, and bid-rigging. None of the Group members shall conduct corrupt practices in any form.
2. Bribery practice collectively means “bribe-giving,” including offering, promising to give, or providing a bribe to public officials or equivalent persons, and “bribe-taking,” including demanding, promising to receive, or receiving a bribe. None of the Group members shall conduct bribery practices in any form, such as offering or receiving entertainment or gifts that may cause suspicions and distrust from society, nor any money or other benefits to profit illegally.
3. Whether inside or outside the country, no one shall offer or receive any entertainment or gift beyond common sense and sound commercial custom to or from a supplier or business partner.
4. No one shall demand that any supplier or business partner offer private profit by exploiting its position or abusing its authority in the company.
5. The Group shall establish the necessary internal structure to comply with Anti-Corruption Laws inside and outside the country by setting an auditing process, providing training to all officers and employees of the Group, maintaining an internal whistle-blowing system that receives anonymous reports, and stipulating relevant rules and procedures. In addition, if any corrupt practice is discovered, the Group shall subject the relevant person to strict punishment and take measures to prevent the recurrence.

6. Any occurrence of corrupt practice, including bribery, and the Group's initiatives to prevent them shall be disclosed as necessary to ensure information transparency.

In addition, to eliminate bribery and corrupt practices and to ensure fair execution in the Group's businesses, the Company shall ask our suppliers and business partners involved in the Group's businesses to cooperate in complying with Anti-Corruption Laws and understanding the Group's principles.

Established April 2, 2021

Amended May 1, 2025

Mitsubishi HC Capital

Representative Director, President & CEO

Taiju Hisai