

Principles for Compliance with Competition Laws

In performing their respective duties, all officers and employees of the Mitsubishi HC Capital Group (“Group”) shall comply with competition laws and related laws and regulations in Japan and other related countries and regions (“Competition Laws”) according to the principles below. In compliance with the Competition Laws and through fair and free competition, the Group shall contribute to boosting the world economy and its sound development.

1. In commercial transactions, whether inside or outside the country, no one shall conduct any acts impeding fair and free competition in the market. Those acts include private monopoly, cartel, bid-rigging, and other practices which restrain competition. Each officer and employee shall strictly refrain from conducting activities that may raise those suspicions.
2. No one shall exchange information or agree with competitors on trading conditions, client lists, and other matters that may affect competition. Each officer and employee shall limit contacts with competitors to the cases imperative.
When contacting competitors, the officer or employee shall properly make and preserve the record of the background and communications made.
3. Each company of the Group (“Company”) shall establish the necessary internal structure to comply with Competition Laws by setting auditing process, providing training, and stipulating relevant rules and procedures.

In addition, to comply with the Competition Laws and ensure fair and free competition in the Group’s businesses, the Company shall ask the cooperation from its suppliers and business partners involved in the Group’s businesses to comply with Competition Laws and understand the Group’s principles.

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