

# **Information Disclosure Policy**

## **1. Basic Policy**

Mitsubishi HC Capital Inc. (the “Company”) shall maintain the proactive and ongoing disclosure of information, with the aim of winning the trust of its diverse stakeholders, including shareholders and investors, and earning their appreciation. Moreover, the Company shall develop an in-house structure for ensuring that information associated with its management policies, business strategies, business activities, financial position, and other matters is disclosed in an accurate, timely and fair manner. In addition, we shall maintain a fair and responsible approach to information disclosure through engagement with stakeholders via various communication activities.

## **2. Basic Principles**

With regard to the disclosure of “material information,” the Company shall adhere to the five basic principles listed below.

### **(1) Transparency**

We shall ensure the fact-based disclosure of information no matter the content.

### **(2) Timeliness**

We shall disclose information in a timely manner and immediately upon the occurrence of an event that warrants disclosure.

### **(3) Fairness**

We shall ensure that disclosed information is communicated broadly to a variety of stakeholders in a fair manner.

### **(4) Continuity**

We shall disclose information in a continuous manner.

### **(5) Confidentiality**

We shall not provide information to third parties before such information has officially been announced.

## **3. Disclosure Standards**

In addition to disclosing mandatory items specified under the rules of stock exchanges, the Financial Instruments and Exchange Act, or other laws and regulations requiring disclosure, we will take a self-directed and proactive approach, disclosing other information considered helpful to our stakeholders.

#### **4. Methods for Information Disclosure**

We shall publicize corporate information requiring timely disclosure through the Timely Disclosure Network (TDNet) run by the Tokyo Stock Exchange while posting such information on our corporate website from the perspective of ensuring its timeliness and public availability. Furthermore, we shall update our shareholders about the Company's business activities via reporting documents and otherwise facilitate stakeholder understanding of its wide-ranging business endeavors by, for example, holding investor briefings. In the course of disclosing information through these methods, we shall comply with relevant laws and regulations, including the Financial Instruments and Exchange Act.

#### **5. Handling of Material Information That Has Yet to Be Publicized**

When we handle inquiries, respond to press interviews, hold such meetings as financial results briefings or participate in similar events, we shall not present material information that has yet to be publicized. Explanations provided on these occasions shall pertain only to facts that are already publicized or known to the general public. Also, the Company shall strictly manage insider information to prevent information leakage and maintain the impartial disclosure of information.

#### **6. Quiet Period**

The Company shall refrain from making comments related to operating results forecasts during approximately one month prior to the announcement of quarterly and annual results (the "quiet period"). Notwithstanding the foregoing, the Company may defy the quiet period upon emergence of a significant fact requiring timely disclosure in accordance with timely disclosure rules of stock exchanges or otherwise warranting the issuance of an extraordinary report.

#### **7. Development of an In-House Structure**

In order to maintain appropriate information disclosure in line with the abovementioned policies, the Company shall strive to develop an optimal in-house structure, with officers and business units in charge of communications playing a central role and all other relevant departments acting in organic collaboration. The Company shall also ensure that opinions gleaned via stakeholder dialogue and deemed to contribute to enhancing corporate value are shared internally, on an as-necessary basis, and adequately addressed.

## **8. Prohibition of Selective Disclosure**

In order to maintain the fairness, impartiality and appropriateness of information disclosure for shareholders, investors, securities analysts and other participants in the capital market, the Company shall not engage in selective disclosure. Selective disclosure refers to the communication of important information, which has yet to be publicly released, to selected individuals or groups prior to the public announcement of such information. The Company shall thus refrain from disclosing information in this manner unless the secrecy of such information is protected by a robust confidentiality agreement.

## **9. Response to the Spread of Market Rumors**

In principle, the Company shall not comment on inquiries about market rumors. However, if it is determined that not responding to a rumor could seriously impact the Company, we shall implement appropriate measures to counter the spread of the rumor.

Establishment: April 1, 2021