



Management Policy for Conflicts of Interest

1. Policy

We will comply with the Insurance Business Act and other applicable laws and regulations and endeavor to manage the transactions that are likely to involve a conflict of interest for the purpose of preventing any unfair harm to the interest of our clients in connection with our insurance-related business.

2. Development of Internal Regulations, etc.

In order to achieve the purpose set forth in 1 above, we will develop internal regulations, manuals, and other documents about conflicts of interest and properly perform our business.

3. Transactions Subject to the Management of Conflicts of Interest and Types Thereof

(1) Transactions subject to management

The transactions subject to the management of conflicts of interest under this Policy are the transactions performed by our Company or a corporation or entity belonging to the Tokyo Kyoto Accounting Office Group (TKAO Group) that are likely to unfairly harm the interest of our clients in connection with the insurance-related business performed by us.

(2) Types of transactions subject to management

We categorize the transactions that are likely to involve a conflict of interest as follows:

- (i) transactions involving a conflict of interest between our clients and our Company or the TKAO Group;
- (ii) transactions involving a conflict of interest between our clients and a business partner or the like of our Company or the TKAO Group;
- (iii) transactions in which our Company or the TKAO Group obtains unfair profits by unfairly using the information acquired in the course of transactions with our clients;
- (iv) transactions in which a business partner or the like of our Company or the TKAO Group obtains unfair profits by unfairly using the information acquired in the course of transactions with our clients; and
- (v) other transactions that are likely to unfairly harm the interest of our clients.

4. Management System, Specification Method, and Management Method

We will specify and manage the transactions that are likely to involve a conflict of interest by the following method:

- (1) If we judge that a transaction is likely to fall under any of the types listed in 3. (2) above in light of the information acquired in the course of transactions with our clients, we will immediately hold a meeting of the Board of Directors and judge whether or not the transaction falls under the transactions that are likely to involve a conflict of interest.



(2) If we judge that the transaction falls under a transaction that is likely to involve a conflict of interest, we will take the measures specified below or other appropriate measures:

- (i) changing the terms and conditions or method of the particular transaction or transactions with our clients;
- (ii) discontinuing the particular transaction or transactions with our clients; and
- (iii) appropriately disclosing to our clients the risk of unfair harm to their interests in association with the particular transaction.