

## **Policies regarding the Fiduciary Duties of the Sumitomo Mitsui Trust Group**

### **Background**

- Fiduciary duty is the cornerstone concept of the trust. Since our founding in 1924 we have conducted business with this concept embedded in our management principles of “Truthfulness and Loyalty”, “Dedication and Development”, and “Trust and Creativity”.
- The Sumitomo Mitsui Trust Group (“the Group”) holds to a shared ethos, our reason for existence (**Purpose**), “to create new value with the power of trusts and let prosperous future for clients and society bloom”, and based on the management principle of “adhering to the principles of sound management based on a high degree of self-discipline with a background of “Fiduciary Spirit”, and establishing strong credibility from society” (**Mission**), we have established, as our corporate ideal (**Vision**), that “based on the “Fiduciary Spirit” and with significant expertise and comprehensive capabilities, the Sumitomo Mitsui Trust Group will create distinct values by leveraging a new business model, combining its banking, asset management and administration, and real estate businesses” and, in order to realize this Vision, we have our executives and employees share in the Codes of Conduct (**Values**) – which includes the imperative to be “Completely Client-oriented” – and we at the Sumitomo Mitsui Trust Group have striven to put our fiduciary duties into practice.
- We believe that, in order to give effect to the fiduciary duty, i.e., to pursue the true benefit of our clients, it is of prime importance that our consulting services are a source of significant expertise that our clients can rely on, presenting our clients with optimal choices suited to their respective needs.
- We are an independent trust bank group that has a wide range of functions – such as product development, sales and provision, asset management, asset administration, and asset preservation – that must meet our clients' needs in step with structural changes to the Japanese economy and society. In this capacity, Sumitomo Mitsui Trust Bank and each Group company will, as our clients' “Best Partner”, continue to provide products and services that accord with the true benefit of our clients. In order to give thorough effect to our fiduciary duties across all operations of each Group company, we have developed and published the “Policies regarding the Fiduciary Duties of the Sumitomo Mitsui Trust Group” and will proceed with other initiatives toward the provision of products and services that are ever more “client-oriented”.
- Note, to show how our initiatives are in accordance with the Financial Services Agency's “Principles for Customer-Oriented Business Conduct”, we have indicated the relationship of correspondence between the Principles and the “Policies regarding the Fiduciary Duties of the Sumitomo Mitsui Trust Group” at the end of this document.

### **Basic Group Policies** (Principles for Action)

- Sumitomo Mitsui Trust Holdings will develop and publish the “Policies regarding the Fiduciary Duties of the Sumitomo Mitsui Trust Group” (the “Policies”), in order to give thorough effect to our fiduciary duties across all operations of the Sumitomo Mitsui Trust Group.
- At the Sumitomo Mitsui Trust Group, we are driven by client peace-of-mind and satisfaction, with the reliance placed in us as a creditor and trustee as a foundation for action. In providing appropriate

products and services suited to the true benefit of our clients, we will, together with establishing the following Group principles for action, proceed to develop a Group governance framework so as to give effect to our fiduciary duties.

- Based on the Policies, each Group company will implement initiatives to provide products and services that are further “client-oriented” and will periodically disclose the status of such initiatives. Sumitomo Mitsui Trust Holdings itself will monitor the status of the initiatives of each company and review the Policies based on considerations such as the progress status of the initiatives.

1	Implementation of a client-oriented approach to consulting	4	Enhancement of our client-oriented focus and expertise
2	Provision of easy-to-understand information	5	Provision of financial services that leverage the diverse functions of the trust bank group
3	Development and provision of products and services that meet the diverse needs of our clients	6	Client peace-of-mind and satisfaction, and contribution to society and the economy

**Domestic Companies that will implement initiatives based on the Policies regarding the Fiduciary**

**Duties of the Sumitomo Mitsui Trust Group**

Sumitomo Mitsui Trust Bank, Sumitomo Mitsui Trust Asset Management, Nikko Asset Management, Sumitomo Mitsui Trust Life Partners, Mutual Fund & Insurance Research Institute, Sumitomo Mitsui Trust Wealth Partners, Sumitomo Mitsui Trust Realty, Sumitomo Mitsui Trust Real Estate Investment Management, Sumitomo Mitsui Trust Research Institute, Sumitomo Mitsui Trust Investment
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The following four companies will, as businesses engaged in operations related to asset management, sales, and asset administration, adopt the "Principles for Concerning Customer-Oriented Business Conduct" and, as well as complying with the "Group Basic Policy (Principles of Action)" described below, proceed with initiatives based on the <Policies by Function> corresponding to their respective areas of operation.

Sumitomo Mitsui Trust Bank	1. Sales; 2. Asset Management and Product Development; 3. Asset Administration; 4. Other Trust Business, etc.
Sumitomo Mitsui Trust Asset Management	2. Asset Management and Product Development
Nikko Asset Management	2. Asset Management and Product Development
Sumitomo Mitsui Trust Life Partners	1. Sales

The following six companies will, as well as complying with the "Group Basic Policy (Principles of Action)" described below, proceed with initiatives based on the <Policies by Function> corresponding to their respective areas of operation.

Mutual Fund & Insurance Research Institute	1. Sales*
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Sumitomo Mitsui Trust Wealth Partners	1. Sales*
Sumitomo Mitsui Trust Realty	4. Other Trust Business, etc.*
Sumitomo Mitsui Trust Real Estate Investment Management	2. Asset Management and Product Development*
Sumitomo Mitsui Trust Research Institute	2. Asset Management and Product Development*
Sumitomo Mitsui Trust Investment	2. Asset Management and Product Development*

\*Implementing the initiatives set forth in the applicable items.

## **Governance Framework**

### **(1) Establishment of a dedicated organization**

- With the Fiduciary Duties & Customer Satisfaction Planning and Promotion Department established as a dedicated organization at Sumitomo Mitsui Trust Holdings, we are building a framework to promote "client-oriented business operations" and "improvement of client satisfaction" in an integrated manner, and to promote the thorough penetration of fiduciary duties throughout the entire Group.

### **(2) Development of a conflict of interest management framework as best practice**

- So that our clients may enter into transactions with us in confidence and peace-of-mind, we will proceed to build an effective conflict of interest management framework, based on the characteristics of the trust bank group operations, products and services.
- Specifically, the "Conflicts of Interest Committee" has been established with external members at its core, which provides ongoing examination of the sufficiency and efficacy of the Group conflict of interest management framework. Further, we have established the "Conflicts of Interest Management Enhancement Committee" on the operations side for the purpose of constant enhancement of the conflict of interest management framework. Also, summaries of the proceedings of the Conflicts of Interest Committee are published as an effort to achieve "visualization" of self-assessment, etc.
- Also, in order to properly manage transactions that have potential conflicts of interest, including the relationship etc., between product providers and sales companies, we are building a framework that ensures efficacy, including internal separation of organizations and authority, restrictions on information and personnel transfers, strengthening of screening when introducing new products and services, and deployment of Conflict of Interest Management Officers to major departments.
- We are building a framework to provide high-quality products and services, from both within and outside the Group, that accord with the needs of our clients, utilizing the Mutual Fund & Insurance Research Institute ("M&I Research Institute"), which has been established as an external evaluation body to evaluate the quality and sales structure, etc. of products and services relating to investment trusts and insurance products.
- In order to respond to changes in the domestic and overseas environment and develop a value creation process tailored to economic actors, Sumitomo Mitsui Trust Bank aims to resolve issues for each stakeholder in a close manner by sharing information and know-how between businesses based on an organizational structure that includes the divisions of "Retail Business", "Corporate Business", and

“Investor Services Business”. We recognize that conducting appropriate conflict of interest management is of paramount importance to business operations, and so we are developing a conflict of interest management framework.

- For details, please refer to our Management Policy Concerning Conflicts of Interest (Summary).

<https://www.smth.jp/en/coi/index.html>

### **(3) Ensuring the independence of the management and operation of the asset management business**

- Not only Sumitomo Mitsui Trust Holdings, but also certain Group companies that conduct asset management business – namely, Sumitomo Mitsui Trust Asset Management and Nikko Asset Management – have established external committees for stewardship activities, etc. with external experts at their core and, together with this, have appointed independent external directors. In this way, we are proceeding with building a framework for ensuring the independence of the management and operation of the asset management business.

### **(4) Group companies to convene a regular discussion panel**

- A fiduciary duties discussion panel has been established by Sumitomo Mitsui Trust Holdings, and Sumitomo Mitsui Trust Bank, Sumitomo Mitsui Trust Asset Management, Nikko Asset Management, Sumitomo Mitsui Trust Life Partners, and M & I Research, out of the group companies that engage in business such as asset management, product development, sales, asset management and evaluation operations, which all have fiduciary duties at their core. The discussion panel utilizes and reflects the knowledge of external experts and, based on its discussions, initiatives are pursued at each of the Group companies. These initiatives relate to matters such as the following (including appropriate mutual checks-and-balances and collaboration between product providers and sales companies):
  - • Improvement of our expertise
  - • Appropriate coordination regarding product composition and sales of each company
  - • Enhancement of risk management, etc.

### **(5) Incentives etc. for the Thorough Implementation and Penetration, etc. of our Fiduciary Duties**

#### **(i) A system of performance evaluation and targets for the promotion and penetration of client-oriented business conduct.**

- Regarding the sale of financial products such as investment trusts and insurance products, regardless of the amount of the fee or involvement of Group companies, we will develop and continuously improve a performance evaluation system that promotes client-oriented business conduct, including evaluation based on the adequacy etc. of consulting services and explanations to clients, evaluation of initiatives to promote our client's long-term asset building, and evaluation of follow-up initiatives with our clients, etc.
- Also, we will strive to strengthen initiatives and approaches aimed at establishment of client-oriented conduct, such as further optimization of intercommunication between our business units and our head

office in the process for establishing targets, etc., and setting criteria relating to initiatives for penetration of our fiduciary duties in the performance evaluation of business units.

**(ii) Optimization of training, etc. for the implementation and penetration of our fiduciary duties.**

- In order to thoroughly implement and promote the practice and penetration of our fiduciary duties at each Group company, we will proceed with various training and discussion initiatives that will address not only the relevant fiduciary principles but also their practical content in specific operations and, together with this, proceed with initiatives that take a bottom-up approach, such as development and continuous improvement of products and services from a client-oriented perspective.
- Also, in order to further enhance our client-oriented consciousness, and to grasp the degree of penetration of our fiduciary duties, we will regularly conduct various awareness surveys and, based on the results, strive to further and continuously improve our policies.

**Policies by Function**

- The Policies by Function are based on the Basic Group Policies (Principles for Action) and specify the content thereof for each function, etc. Even if a matter is not specified in the Policies by Function, we will deal with the matter in accordance with its nature, based on the purport of the Basic Group Policies and the Policies by Function.

**1. Sales**

**(1) Implementing a client-oriented approach to consulting**

- In order to provide products and services suited to the true benefit of our clients, we will strive to gain a shared understanding of the asset and liability situation of our clients, which will change with their lifecycle, and their corresponding needs, through high-quality consulting involving active use of consulting tools, etc., at the time of proposing the products and services, and even after the transaction.
- We will further optimize our consulting activities, including life-planning and financial planning based on our clients' stage of life and life events, i.e. "working generation", "retirement generation", and "seniors", etc.
- We will strive to expand opportunities for proposals and consulting to a broad range of clients through measures such as consultations online and on weekday evenings and holidays.
- When proposing products and services, we will strive to present the optimal options suited to the needs of the client, based on the content of the consultation, and in light of the client's knowledge, experience, asset situation and investment objectives.
- We will continue to develop a framework for the evaluation of the promotion of operations, with an emphasis on consultation services that contribute to the true benefit of the client, addressing matters such as client-oriented activities and skills enhancement.

**(2) Provision of easy-to-understand information**

- To assist in our clients' investment decisions, including understanding of the characteristics of products and comparison with other financial products, we will strive to provide easy-to-understand explanations about product and service characteristics, risks, fees, and the envisioned client attributes, etc., based on the complexity of products and services, and the importance of information to be provided, and to take proper action that fits with our clients' understanding.
- In order to solidify the relationship of trust with our clients and build long-term business relationships, we will strive to provide high-quality follow-up services so as to assist in our clients' investment decisions. These will include, in addition to regularly providing information regarding market movements and the management status of products held, the provision of information regarding market movements and market forecasts in a timely and appropriate manner when major market events do occur, etc. Also, we will develop a framework that incorporates review of such activities into performance evaluations.

**(3) Provision and development of a broad range of products and services that meet the diverse needs of our clients**

- In order to meet the diverse needs of our clients, we will make available a broad range of high-quality products and services that accord with the needs of our clients, based on the various voices and opinions of our clients, and through activities such as collaboration with a broad range of asset management companies and insurance companies, etc., and joint-development of products and services.
- We will continue to provide appropriate solutions to the various issues arising for individual clients with the arrival of the '100 Year Life Era', leveraging our unique know-how as a trust bank group.
- We will provide products that contribute to our clients' asset building, with a focus on "long-term – diversified – stable" structured investment products, including accumulation-type products suited for ongoing investment. Further, we will adopt a fee system that accords with the long-term asset building of our clients.
- We will pursue the creation of opportunities that are responsive to the diverse needs of our clients, such as internet transactions.
- We are reviewing our product lineup so that we can always provide products and services that accord with the true benefit of our clients, regardless of the involvement of Group companies or amount of the fee.
- When making proposals to clients, we will continue to provide products and services that are suitable for clients through measures such as comparing similar products and services, etc.
- We will promote proposals that contribute to our client's medium- to long-term asset building, and will develop a performance evaluation framework, etc. with an emphasis on customer-oriented activities, addressing matters such as the adequacy, etc. of consulting services and explanations to our clients.

**(4) Thorough implementation of our client-oriented focus and improvement of expertise**

- ① Establishing a corporate culture with the aim of becoming our clients' "best partner"

- Through measures such as training and discussions at each Group company, we will aim for thorough penetration of judgment and practices that are based on these Policies. As well as this, we will build performance evaluation and target systems that value initiatives that contribute to the implementation and penetration of client-oriented actions. By so doing, we will give thorough effect to our fiduciary duties, and promote the establishment of a corporate culture in which every one of our executives and employees aims to be our clients' "Best Partner".
- ② Improve expertise to support client-oriented consulting, etc.
- Through measures such as training for executives and employees and support for the acquisition of specialist qualifications, we will increase our knowledge and expertise regarding the market environment, products and services.

#### **(5) Provision of financial services that leverage diverse functions**

- As a trust bank group, while remaining thoroughly attentive to conflict of interest management, we will fully mobilize our diverse and flexible functions, such as the banking business, asset management and administration business, real estate business, etc., and swiftly and accurately provide optimal and comprehensive solutions for our clients, whether they are individuals or corporate entities.

#### **(6) Reflection of client voices and evaluations in our services, etc**

- We will apply the opinions and service evaluations that we receive from our clients on various occasions, such as questionnaires, to continuously improve our services. Further, in order to consolidate our client-oriented business conduct, we will develop a framework that incorporates evaluations from our clients into performance evaluations.

#### **(7) Client peace-of-mind and satisfaction, and contribution to society and the economy**

##### ① Provision of new products and services that are responsive to social and economic changes

- As well as providing products and services that bring peace-of-mind and satisfaction to our clients, we will contribute to society and the economy by utilizing our investment functions, etc., and through the creation of new products and services that respond to structural changes to the economy and society.

##### ② Proactive initiatives for financial and economic education and investment education

- To enable clients to proactively and rationally select financial products, and engage in stable asset building, we will engage in activities in connection financial and economic education and knowledge enhancement; via joint initiatives with other organizations, in addition to life-planning through consulting, and holding seminars etc.
- Taking into account the possibility that elderly clients may experience a decline in their cognitive and decision-making abilities, we will promote the creation of an environment in which our clients can continue to use our financial products and services, and the provision of ongoing asset management and other services that give due respect to our clients' intentions.

## **2. Asset Management and Product Development**

### **(1) Enhancement of asset management**

- We will strive to maintain an appropriate asset management system by developing a clear and rational investment policy, and implement the PDCA cycle in our asset management processes.
- For both active management and passive management, we will encourage the sustainable growth of investee companies by initiatives such as dialogue with companies based on Japan's Stewardship Code, and ESG initiatives, etc. from a global perspective and, by refining investment methods and increasing the sophistication of asset management, we aim to maximize our clients' profits.
- Regarding assets entrusted to us, we will strive to execute transactions on the best conditions for our clients.

### **(2) Provision and development of products and services that meet the diverse needs of our clients**

- In order to resolve the asset management issues that arise for the respective life-stages of each of our clients, we will strive to expand the line-up of high-quality products and services, both within and external to the Group.
- We will strive to develop and provide products and services that make comprehensive use of the Group's internal and external know-how, functions and networks, in order to respond to the diversifying asset management needs of our clients and changes to the investment environment.
- We will be receptive to a broad range of clients' needs, including those of institutional investors, such as pension funds, as well as their evaluations and opinions regarding Sumitomo Mitsui Trust Holdings' asset management services. Further, we will utilize methods such as evaluation by external bodies where necessary, in order to pursue enhancement of the asset management services and strengthen the relevant frameworks.

### **(3) Implementation of a client-oriented approach to consulting and the provision of information**

- In order to provide products and services suited to the true benefit of our clients, we will strive, through high-quality consulting, to gain a shared understanding of the asset and liability situation of our clients, which will change with their lifecycle, and their corresponding needs.
- When proposing a product or service, we will make proposals that are suited to the needs of the client, based on the content of the consultation, and in light of the client's knowledge, experience, asset situation and contracting objectives.
- When proposing a product or service, we will strive to provide appropriate information, in light of the client's knowledge, trading experience, asset situation and contracting objectives, in order to gain the understanding of the client.
- For all our individual clients and investment trust sales companies nationwide, we will provide information useful for improving financial knowledge via training programs, various events, and websites etc., so that they may acquire accurate knowledge about, and deepen their understanding of, asset-formation and products.
- To assist in our clients' investment decisions, we will strive to provide high-quality follow-up services. This will include, in addition to regularly providing information regarding market movements and the



management status of products held, providing information regarding market movements and market forecasts in a timely and appropriate manner when a major market event does occur, etc.

- To assist in our clients' investment decisions, we will provide easy-to-understand explanations about product characteristics, risks, fees, and the envisioned client attributes, etc.

#### **(4) Enhancement of our expertise**

- We will strive to ensure the continued and stable development of asset management professionals responsible for provision of comprehensive solutions that combine "high-quality investment consulting" and "a rich selection of high-quality products", as well as overall maintenance of personnel and the continuity and replicability of operations.
- In the evaluation of operations personnel, such as fund managers and analysts, etc., we will strive to secure an operational structure that has significant expertise, through evaluation and treatment that is focused on medium- to long-term investment results.

#### **(5) Enhancement of stewardship activities as a “Responsible Institutional Investor”**

- The Group's asset management companies will properly fulfil their roles as “Responsible Institutional Investors” through stewardship activities based on policies and guidelines set by each such company. Further, in order to achieve stable economic growth and a sustainable society – not only in Japan, but also globally – we will proceed with the promotion of enterprise through stewardship activities and, together with this, take action on global ESG issues.
- In relation to engagement activities, in addition to analysts, etc. engaging in dialogue with investee companies that contribute to the enhancement of their corporate value, we will make effective use of collective engagement and the international framework represented by the United Nations' PRI (Principles for Responsible Investment), in order to take action on global ESG issues, and to enhance the effectiveness thereof. Through these globally-minded stewardship activities, we are effectively and efficiently pursuing the enhancement of investee company value and continuous improvement on ESG issues.

#### **(6) Building and strengthening the governance framework that ensures independence**

- With respect to Group asset management companies, in order to strengthen the framework that gives top priority to the interests of our clients, we will proceed to build a framework for ensuring the independence of management and operations from the Group's sales companies, by, for example, installing independent outside directors.
- Regarding the exercise of voting rights, etc., we are implementing a more sophisticated conflict of interest management framework that ensures transparency through means such as checks by external experts in accordance with Japan's Stewardship Code. In particular, at Sumitomo Mitsui Trust Asset Management and Nikko Asset Management, respectively, we have established committees at each company that are majority comprised of external experts who have guaranteed independence, and which examine matters such as the appropriateness of exercise of voting rights and communications. A

summary of the contents of the deliberations of these committees is published and presented in a “visualized” format.

- In order to continue to increase the sophistication of the above-mentioned framework without interruption even after the integration of the asset management business of Sumitomo Mitsui Trust Bank into Sumitomo Mitsui Trust Asset Management, we plan to establish a stewardship subcommittee consisting of members of the external committees of the Group’s asset management companies within the Sumitomo Mitsui Trust Holdings’ Conflicts of Interest Committee and strengthen the oversight of Group’s overall stewardship activities.
- Also, at Sumitomo Mitsui Trust Bank, Sumitomo Mitsui Trust Asset Management, and Nikko Asset Management, in order to further enhance the transparency of the exercise of voting rights, we are publishing the results of the exercise of voting rights for each investee company and each agenda item. We conduct review also of the guidelines for exercise of voting rights from time to time as appropriate.

#### **(7) Further strengthening of the Group asset management business model**

- Sumitomo Mitsui Trust Asset Management is the core asset management company of our Group, with its origins in our Group trust bank, it has strength in index investment, and Nikko Asset Management is a unique asset management company with a diverse domestic and overseas network, and has strength in discovering and selling advanced global products. By leveraging their respective strengths, we will provide high-quality products and services that enhance the value of clients’ assets.
- Also, Sumitomo Mitsui Trust Asset Management and Nikko Asset Management have, respectively, transitioned from a Company with Corporate Auditors to a Company with an Audit and Supervisory Committee, in order to implement their fiduciary duties across all operations and thoroughly conduct client-oriented operations. We are striving to improve management transparency, etc. through strengthening audit and supervisory functions by an Audit Committee with independent external directors comprising the majority of its members.
- Through such efforts, the Sumitomo Mitsui Trust Group will further strengthen the development and provision of products, etc. that accord with the true needs and benefit of our clients and, through supply of growth capital to the market and constructive dialogue with investee companies, contribute to the enhancement of corporate value.

### **3. Asset Administration**

#### **(1) Maintaining and improving the reliability and speed of our asset administration services**

- Aiming to improve the reliability and speed of the office operations that form the cornerstone of asset administration services, we will conduct appropriate allocation of resources, such as human resources, administrative infrastructure, and systems, etc.
- We will strive to develop human resources that possess high level expertise in the legal and tax systems, etc. required for asset administration services.

**(2) Enhancing our office functions and systems, etc. as social infrastructure to meet our clients' needs**

- In order to respond to the increasingly diverse and sophisticated asset management needs of our clients worldwide, we will work to enhance our administrative processes, and systems, etc.

**(3) Enhancing the information-provision and services that contribute to our clients' investment activities and middle/back office operations**

- In order to contribute to the enhancement of our clients' investment activities and middle/back office operations, in addition to various reports, etc., we will strive to provide high-added-value information (legal, tax and market-related) in a timely manner based on information from our overseas Group affiliates and custodians, etc.
- As a trust bank group, we will utilize our banking know-how, striving to provide services that contribute to the increased efficiency and sophistication of our clients' middle and back office operations.

**4. Other Trust Operations, etc.**

**(1) Thorough execution of our responsibilities as a trustee**

- As a trustee of trusts, and not limited to our asset management operations, for our clients who are beneficiaries, we will faithfully discharge our trustee responsibilities, including the duty of care as a good manager, the duty of loyalty, and the duty of segregated management of assets, and conduct the trust operations by giving the top priority to the interests of our clients.

**(2) Initiatives for peace-of-mind and safety, including preservation, etc. of client assets**

- In 'the '100 Year Life Era', the task of addressing issues arising from a super-aged society, such as decreased decision-making capacity, etc. due to dementia or other illness, is rapidly becoming an important societal challenge, and in light of this, based on the increasing need to ensure peace-of-mind regarding asset preservation, etc., of our elderly clients, and to secure succession of assets, we will strive to develop and provide products and services, and co-ordinate with other businesses, etc., so as to firmly meet our clients' needs with respect not only to asset management, but also regarding asset preservation and succession, and non-financial services.
- We will research and promote scrupulous information-provision practices and the creation of an environment for user protection, etc. responsive to our client's cognitive and decision-making abilities, etc. and also taking into account developments in "gerontology" (aging studies), etc.
- We will proceed with implementation of various initiatives aiming at creation of an environment for clients that is easy to use, so that all clients can feel comfortable using our products and services. Initiatives will include thorough employee education and distribution of qualified personnel, and expansion of opportunities for proposals and consulting.

**(3) Initiatives for a client-oriented approach in real estate operations**

- Real estate may be said to be the largest asset for individual clients, and in real estate brokerage operations, we will strive to provide proper and easy-to-understand explanations that will allow clients to engage in transactions with peace-of-mind.
- We will strive to create an environment that is easy for clients to use such as by providing information and procedures utilizing IT systems.