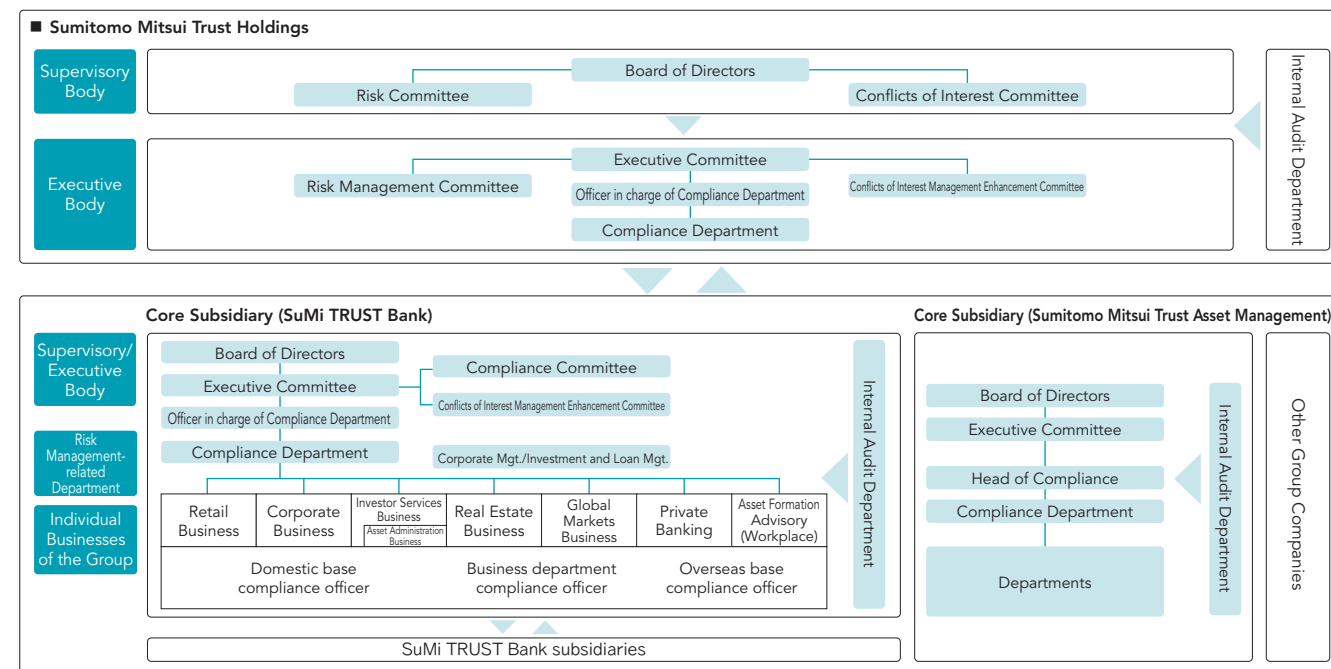


Compliance

1 SuMi TRUST Group's basic initiative policy and compliance framework

The Group's mission and vision is to be known as The Trust Bank, and we therefore place compliance as one of the most important management issues in realizing that goal. Our Codes of Conduct ("Value") advocate for strict compliance with applicable laws and regulations, and the Board of Directors has established Compliance Rules that lay out the organizational structure required to meet them, including the Group's basic policies, standards to be met by directors, officers and employees. In concrete terms, the

Board of Directors approves the formulation of an annual Compliance Program, through which it will regularly evaluate progress. In addition, in order to develop compliance frameworks tailored to the business of each company, SuMi Trust Holdings formulates a compliance program for each Group company and provides guidance on and supervision of progress and achievements, to manage the group-wide compliance framework.



2 Initiatives for thorough compliance awareness

A Compliance Manual is distributed throughout the Group to explain laws and regulations that must be followed and describes how to handle illegal or inappropriate behavior when it is detected. We are also improving compliance training to maintain a high level of compliance awareness throughout the Group. More specifically, in

addition to us providing training materials for e-Learning training and discussion-based study sessions, the Group companies provide training and study sessions tailored to their respective businesses and products offered, and use e-Learning to provide training on specific themes.

Hotline System

The Group has established the Compliance Hotline to enable directors, officers, and employees to directly report legal violations to the Compliance Department and external law firms. The system protects whistleblowers through careful handling of information and privacy protection, by prohibiting unfavorable treatment of whistleblowers, and through the use of simple reporting methods,

by phone (to an external law firm) or online (to an in-house point of contact (SuMi TRUST Bank)). We have also set up an accounting hotline to receive reports of inappropriate accounting practices.

* Please see "Sustainability Report" (<https://www.smth.jp/english/sustainability>) for the number of cases reported at the Group and other information.

3 Initiatives to prevent money laundering*and exclude criminal groups

The Group has published an Anti-Money Laundering Compliance Policy that delineates how we are continuously upgrading the systems in place by conducting regular risk assessments at Group companies including overseas offices, supervising the development of mitigation systems tailored to specific risks and overseeing upgrades in order to prevent unauthorized use of financial services.

The Group's Codes of Conduct ("Value") declares that it will stand firm against anti-social forces (i.e., criminal groups) and we are working to prevent any transactions that involve anti-social forces. We have introduced exclusion clauses against organized crime groups for our various products and services, and we work closely with the police

and other external agencies to cancel any transactions if it becomes clear after the transaction has begun that it is being conducted with a criminal group.

* Anti-money laundering is defined by the Group as the prevention of unauthorized use of financial services as detailed in the points (1)-(3) below.

- (1) Money laundering: The act of attempting to prevent the discovery or seizure by investigative authorities of funds obtained through fraudulent/illegal means
- (2) Terrorist financing: The act of providing support through collecting or provision of funds or real estate that will be used to fund terrorist acts or otherwise fund the activities of terrorist organizations
- (3) Proliferation financing: The act of providing funds or financial services to any individual or group subject to a freeze of assets or other measures for being involved in the development, possession, or export of weapons of mass destructions (nuclear, chemical, or biological weapons)

* Please see "Sustainability Report" (<https://www.smth.jp/english/sustainability>) for more detailed information on the initiatives to prevent money laundering and exclude criminal groups.

4 Initiatives to prevent bribery and corruption*

The Group has published an Anti-Bribery and Corruption Compliance Policy, and has implemented an anti-bribery and anti-corruption program under the supervision of management. The program aims to review and strengthen prevention measures through regular risk assessments on bribery and corruption, and we are working to enhance the system by building close, cooperative relationships between overseas offices and local legal representation in order to

respond quickly and appropriately in those localities where risk is particularly high.

* The Group defines bribery and corruption as the act of offering, promising, or providing entertainment, gifts of money or goods, or other benefits with the intent to improperly influence the counterparty, and the act of receiving or requesting goods or services with the intent to improperly benefit the provider.

* Please see "Sustainability Report" (<https://www.smth.jp/english/sustainability>) for more detailed information on the initiatives to prevent bribery and corruption.


5 Conduct risk management initiatives

SuMi TRUST Group recognizes risk that could have a negative impact on the Group, clients, markets, financial infrastructure, society, or the workplace environment due to an officer or employee of a Group company engaging in behavior that violates professional ethics or otherwise fails to meet the expectations and trust of stakeholders, as conduct risk.

In order to meet the expectations and trust of stakeholders, each Group company creates a PDCA cycle to identify, control, assess and improve conduct risk, thereby


not only controlling problematic conduct (misconduct) but also promoting desirable conduct (good conduct).

In October 2022, we formulated "Our Standards of Conduct" as a guideline for executives and employees of each Group company to put the Group's important values into concrete action. The Standards are presented within the Group as a mindset to act appropriately, and the contents are published to help stakeholders to deepen their understanding of the Group.



SUMITOMO MITSUI TRUST HOLDINGS

- Our Standards of Conduct -



Also posted on our website
https://www.smth.jp/english/about_us/management/standard