

Revision date October 1, 2025

Basic Policy on Establishing an Internal Control System

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1. System to ensure appropriateness of operations of the corporate group comprising the Company and its subsidiaries

- i. The Company has formulated its corporate philosophy to serve as the source and guideline of all of the Group's activities. The Company shall strive to promote this philosophy internally among Group executives and employees, and promote initiatives to realize it.
- ii. The Company oversees Group management and exercises its voting rights appropriately for subsidiaries in which it directly holds shares, with the aim of upholding its responsibility to maximize the Group's corporate value.
- iii. The Company has entered Management Control Agreements with subsidiaries in which it directly holds shares as a financial holding company. It manages subsidiaries pursuant to these agreements by requiring them to comply with the Groupwide Basic Policy, and to report and obtain prior approval of the Company on matters necessary for ensuring the appropriateness of operations of the Group, including subsidiaries. In this way, the Company responsibly performs its role in building and executing systems for appropriate management across the entire Group.
- iv. Based on its Basic Policy on Management of Transactions within the Group, the Company confirms the appropriateness and legal compliance of intra-Group transactions by the Company and its subsidiaries that have the potential to significantly impact Group management before commencement of those transactions.
- v. The Company's internal audit department takes responsibility for ensuring that subsidiaries have appropriate internal control systems in place, and monitors and verifies the results of internal and third-party audits of subsidiaries.

2. System to ensure that the execution of duties by Corporate Executive Officers and employees complies with laws and regulations and with the Articles of Incorporation

- i. The Company has established a code of conduct as a basic policy for compliance with laws and regulations, etc., and makes this code clear to the Company's executives, employees and subsidiaries.
- ii. The Company has created a compliance manual that provides specific compliance guidelines and a compliance program that defines specific plans.
- iii. The Company has created a compliance supervisory department to promote its compliance program. The compliance supervisory department regularly reports to the Board of Directors on the progress of the compliance program.
- iv. The Company has formulated the Basic Group Policy on Eradicating Anti-social Forces, takes a firm stance to counter anti-social forces, and builds the structure necessary to fulfill this policy.
- v. The Company has established an internal hotline system and informs its executives, employees and subsidiaries about how to use it. This system allows employees or others who become aware of management policies, business activities or other actions that contravene (or are in danger of contravening) laws and regulations to report them directly to a hotline desk. The system prohibits any action from being taken against employees or others who provide such notification.
- vi. The Company has formulated Group Information Security Policies and established a structure to properly control Group information assets, including customer information.
- vii. The Company has created the Conflicts of Interest Policy within the Group and ensures that the necessary systems are in place to properly control transactions that have the potential to unjustly harm the interests of customers.
- viii. The Company has established an internal audit supervisory department, which is independent from other operating departments. The internal audit supervisory department liaises and cooperates with the Audit Committee and the independent auditor; monitors and verifies, from an independent and objective viewpoint, the implementation and operational status of the

internal control system; and reports regularly to the Audit Committee on the status of internal audits.

- ix. The Company has formulated the Basic Policy related to the Group's Internal Audits as well as Regulations on Internal Audits, and informs its executives, employees and subsidiaries of these.

3. System for storing and managing information related to the execution of duties by Corporate Executive Officers

The Company has established the Record-keeping Regulations to ensure that documents pertaining to the execution of duties by Corporate Executive Officers, such as records of decisions at Board of Directors and Executive Committee meetings, are appropriately stored and managed in accordance with laws and regulations and with the Record-keeping Regulations.

4. Regulations and other systems related to managing risk of loss

- i. The Company has formulated the Fundamental Principles for Risk Management Activities as a basic policy on Group risk management and informs its executives, employees and subsidiaries of these.
- ii. The Company has established a risk management supervisory department to manage risks appropriately for the Company and its subsidiaries, in accordance with each entity's scale, characteristics and business model. This department reports regularly to the Board of Directors on the status of risk management.
- iii. The Company evaluates the capital adequacy of subsidiaries to ensure that their levels of capitalization are sufficient in light of the risks the Group directly faces, and to implement appropriate capital allocations. If necessary, the Company takes measures designed to strengthen capital bases.
- iv. The Company has established the Basic Policy Related to Group Business Continuity Risk Management, as well as contingency plans, to build a system that enables the Group to respond rapidly to a crisis and put in place measures to minimize the impact of these risks. The Company has made these known to its executives, employees and subsidiaries.

5. System to ensure the efficient execution of duties by Corporate Executive Officers

- i. The Company has established approval regulations and other internal rules, and created an appropriate structure for the efficient execution of duties.
- ii. The Company has set up the Executive Committee to conduct prior deliberation of the Company's important business execution.
- iii. The Company has established the Business Plan Control Regulations and formulates and oversees non-consolidated and consolidated medium-term business plans as well as annual business plans. It also regularly confirms progress on business plans.

6. System to ensure reliability of financial reporting

The Company maintains the necessary system to ensure reliability of financial reports, in accordance with the Basic Policy Regarding Group Financial Reporting.

7. Items pertaining to employees who are requested to assist the Audit Committee in its duties

If the Company receives requests from the Audit Committee for employees to be allocated to assist in its duties, the Company assigns such personnel without delay.

8. Matters pertaining to the independence from Corporate Executive Officers of employees assigned to assist the Audit Committee in its duties

- i. The prior consent of the Audit Committee is required before the appointment, removal and evaluation of employees assigned to assist the Audit Committee in its duties.
- ii. Employees assigned to assist the Audit Committee in its duties must exclusively follow the instructions and directives of the Audit Committee once they are given.

9. System for Directors (excluding Directors who are Audit Committee members), Corporate Executive Officers, and employees to report to the Audit Committee, and other systems for reporting to the Audit Committee

- i. If Directors (excluding Directors who are Audit Committee members; the same applies hereinafter in item 9), Corporate Executive Officers, or employees are requested to provide reports regarding the execution of their business to the Audit Committee, they must do so immediately.
- ii. If Directors, Corporate Executive Officers, or employees discover facts that could significantly affect the operations or financial condition of the Company or its subsidiaries, they must report such discovery to the Audit Committee immediately. No actions may be taken against persons providing such reports, and this prohibition shall be shared among the Company's executives, employees and subsidiaries.
- iii. If Directors, Corporate Executive Officers or employees receive notification via the internal hotline system, they must report immediately to the Audit Committee.

10. Other systems to ensure the effectiveness of audits by the Audit Committee

- i. The Representative Corporate Executive Officer endeavors to deepen relationships based on mutual awareness and trust with the Audit Committee and takes the necessary measures to create an environment for audits.
- ii. When Audit Committee members request the payment of expenses or discharge of obligations pertaining to requests for counsel or commissions of investigations, appraisals, or other services from attorneys, certified public accountants, or other outside specialists, for the execution of the Audit Committee members' duties, the Company shall pay such expenses or discharge such obligations unless the Company proves that such expenses or obligations were not necessary to the execution of the Audit Committee members' duties.

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