

Compliance

Message from the Head of Legal and Compliance Group

As we accurately understand changes in the local and international environment and rising social expectations, we will aim to improve our compliance framework to meet the demands of our growing and diverse business model. Our goal is to gain the respect of the market and shareholders as well as the general trust of the public.

We will strive to foster a culture where each executive and employee independently practices compliance activities through messages from management and ongoing training.

Basic Concept

- Our group positions thorough compliance as a fundamental principle of management. We have established a compliance framework to ensure adherence to laws and regulations and to conduct business activities with integrity and fairness, consistent with social norms.
- All executives and employees are required to adhere to the "Mizuho Lease Group Corporate Code of Conduct" as specific guidelines for conduct.



Managing Executive Officer
Head of Legal and Compliance Group
Makoto Matsubara

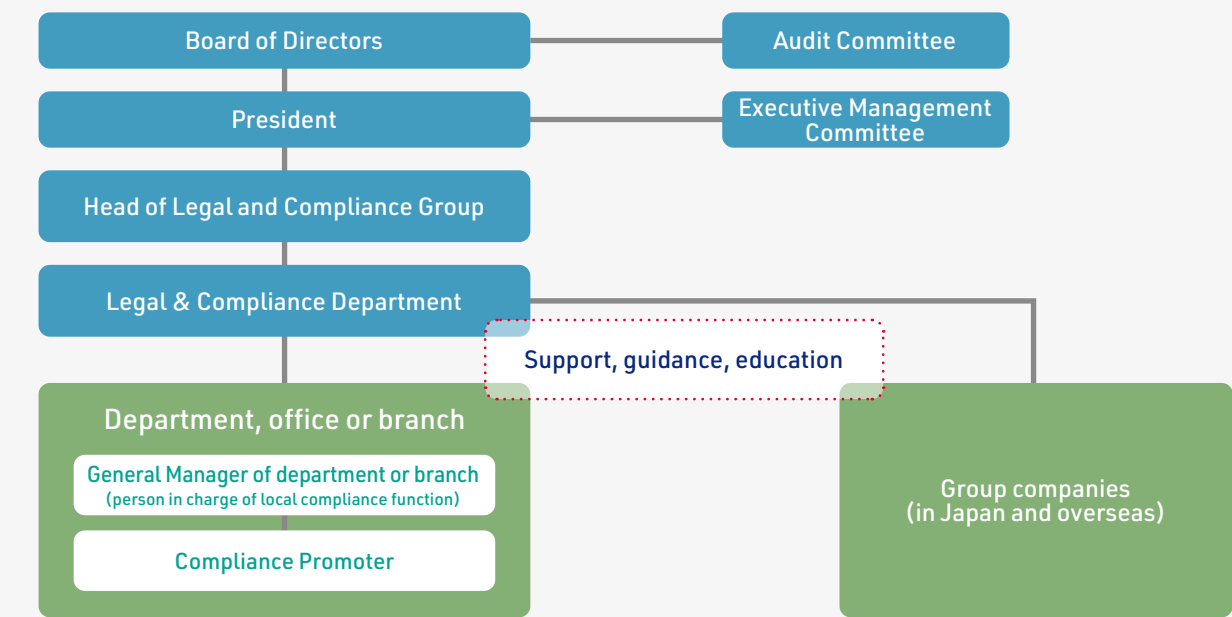
Compliance Management System

In our group, the Legal and Compliance Department, under the leadership of the Chief Compliance Officer (CCO), who is responsible for overall compliance, is responsible for planning and managing compliance-related activities as well as overseeing and guiding compliance status.

Each General Manager of departments and branches, who is in charge of the local compliance function, conducts autonomous control activities such as checking compliance status based on the instructions of the Legal and Compliance Department.

Additionally, we develop a specific practical plan, the compliance program, annually and report on the status of our efforts related to compliance measures to the Executive Management Committee and the Board of Directors every six months, following up on the implementation status.

Compliance Framework



Education and Training

In order to enhance the compliance awareness of executives and employees and to promote autonomous compliance activities, we are implementing theme-based training for all executives and employees, as well as position-specific training depending on their roles, utilizing e-learning.

In the training, in addition to explaining the rules and procedures, we aim to encourage awareness among executives and employees by highlighting issues and points to consider using case studies appeared in the media, ultimately leading to concrete actions. Additionally, we are promoting the awareness of compliance throughout the organization by utilizing the internal social networking service for information sharing and introducing case studies.

Additionally, the "Mizuho Lease Group Corporate Code of Conduct," which are the behavioral guidelines to be followed, and the "Compliance Manual," which serves as a specific guide for compliance, are posted on the company's intranet so that executives and employees can access them at any time and apply them to their work.

Training Conducted in FY2024



- Executive Compliance Training (annually)
- Compliance Training for General Managers of departments and branches (twice a year)
- Compliance Training for group managers, etc. (annually)
- Compliance Training for new graduates /mid-career hires (monthly)
- Compliance Training for departments and branches (4 times per year)
- Training on compliance themes for headquarters, etc. (insider trading regulations, information management, etc.)

Basic Policy of the Corporate Code of Conduct

- (1) Social Responsibility
- (2) Practicing a Customer-First Approach
- (3) Compliance with Laws and Regulations
- (4) Respect for Human Rights
- (5) Severing ties with antisocial forces

Measures to Prevent Money Laundering, etc., and Severing Ties with Antisocial Forces

The importance of countering money laundering, terrorist financing, and proliferation financing is high, and strengthening countermeasures has become an international challenge. We have established various policies and procedures to comply with relevant laws, regulations, and guidelines (such as the "Regulations on the Prevention of Money Laundering, etc."), and conducted training, both of which constitute a framework for appropriate management.

Regarding countermeasures against antisocial forces, the Mizuho Lease Group Corporate Code of Conduct stipulates the complete severance of all ties with antisocial forces that threaten the order and safety of civil society. We have established check and management systems and thoroughly instill this policy in executives and employees through training, etc.

Whistleblowing System (Compliance Hotline)

We have established a whistleblowing system to enable the early detection and correction of misconduct and legal violations, etc. and have set up various reporting channels both within and outside the company. We promote awareness and utilization of these system through training sessions for all executives and employees, posting notices, etc., while also enabling anonymous reporting. Furthermore, we have established a Whistleblower Policy that prohibits any adverse treatment of whistleblowers, and we operate appropriately to ensure thorough protection of whistleblowers.

Reporting Windows Available



- **Compliance Hotline (Internal)**
[Reporting Targets] - Misconduct - Compliance-related issues
- **External Reporting Window (External: Law Firm)**
[Reporting Targets] - Misconduct - Compliance-related issues - Human Rights-related issues such as harassment
- **Harassment Consultation Desk (Internal)**
[Reporting Target] - Human rights-related issues such as harassment
- **Auditors Hotline (Internal)**
[Reporting Targets] - Misconduct - Compliance-related issues - Human Rights-related issues such as harassment



Poster promoting Whistleblowing System