Compliance

Message from the Head of Legal and Compliance Group

Our goal is to gain the respect of the market and shareholders as well as the general trust of the public, and to that end we seek to accurately understand changes in the local and international environment as well as rising social expectations, while improving our compliance framework to meet the demands of our growing and diverse business model.
We will strive to foster a culture where each officer and employee takes ownership of compliance through messages from management and ongoing training.

(Mizuho Leasing Group Corporate Code of Conduct)

- The group has formulated the Mizuho Leasing Group Corporate Code of Conduct to set out concrete behavioral guidelines for officers and employees.

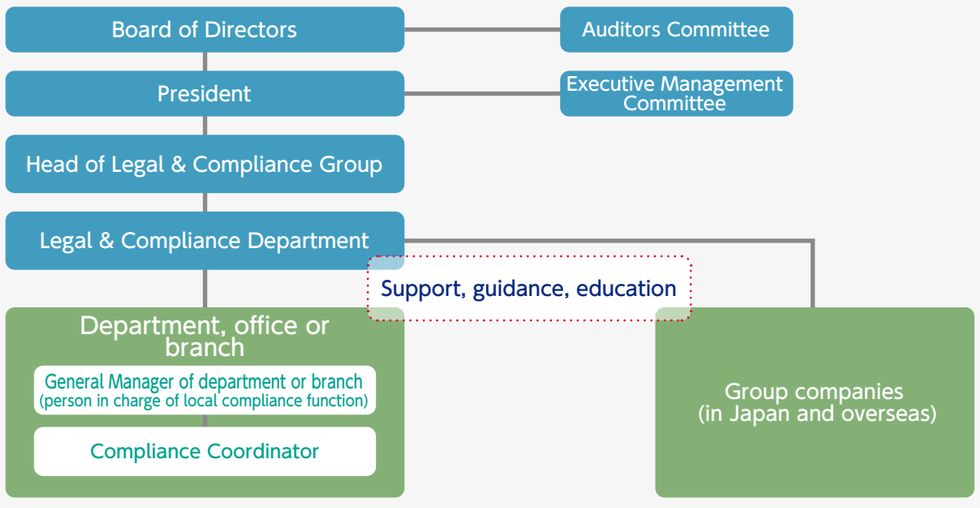
Ⅰ Our Fundamental Commitment	Conducting business honestly and fairly in compliance with laws and regulations, fostering a sound risk culture, and practicing fair information disclosure
Ⅱ Our Commitment to Customers and Business Partners	Providing high-quality financial and business solutions that contribute to customers' growth, and creating new value together with our business partners
Ⅲ Our Commitment to Society and the Economy	Contributing to sound social and economic activities through respect for human rights, consideration for the environment, and prevention of money laundering and bribery, etc.
Ⅳ Stance toward employees	Realizing a safe and healthy working environment that respects diversity and enables employees to thrive, free from discrimination and harassment



1 〉Compliance Management System

In our group, the Legal & 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 monitoring compliance and providing guidance.
As a person in charge of the local compliance function, general managers of departments and branches conduct autonomous control activities such as checking compliance status based on the instructions of the Legal & Compliance Department.
Additionally, we develop an annual Compliance Program setting out specific action 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



2 〉Education and Training

In order to enhance the compliance awareness of officers and employees and to promote autonomous compliance activities, we are implementing theme-based training for all officers and employees, as well as position-specific training depending on their roles, utilizing e-learning.
In this training, we seek to promote understanding and awareness of the Mizuho Leasing Group Code of Conduct, which provides specific guidelines for the daily decision-making and behavior of officers and employees. We also provide explanations of the relevant rules and procedures and use case studies taken from real-world scenarios to further enhance awareness and feed this through to practical action.
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.

Mizuho Leasing Group Code of Conduct

Ⅰ. Honest behavior
Ⅱ. Financial integrity
Ⅲ. Fair and impartial business practices
Ⅳ. Protection and appropriate use of information
Ⅴ. "Speak-up" culture and whistleblowing system

Training Conducted in FY2025

- Executive Compliance Training (annually)
- Compliance Training for General Managers of departments and branches (twice a year)
- Compliance Training for managers, etc. (annually)
- Compliance Training for new employees and mid-career hires (monthly)
- Compliance Training for departments and branches (four times a year)
- Training on compliance themes for headquarters, etc.


Executive Training Session

3 〉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 systems through training sessions for all officers and employees, displaying on digital signage within the office, 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 Channels Available

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



Notice for Compliance Hotline displayed on internal digital signage

4 〉Measures to Prevent Money Laundering and Bribery, etc.

Based on the Mizuho Leasing Group Corporate Code of Conduct, the group has put in place measures for Anti-Money Laundering and Combating the Financing of Terrorism, also establishing rules and systems for managing the severance of ties with antisocial forces and the prevention of bribery, etc. To enhance the efficacy of these initiatives, we also conduct ongoing training for officers and employees.

1 Measures to prevent money laundering, terrorist financing, etc.

- Verification at time of transaction and reporting of suspicious transactions
- Screening against sanctions lists
- Applying a risk-based approach

2 Severance of ties with antisocial forces

- Inclusion in contracts of clauses prohibiting transactions with organized crime groups
- Screening when transactions are initiated and on a regular basis thereafter
- Collaboration with the police and external experts

3 Preventing bribery, etc.

- Setting internal rules concerning entertainment and gift-giving
- Clarifying standards for interacting with government officials, etc.
- Establishing a process for reporting and correcting violations

Mizuho Leasing Group Corporate Code of Conduct
https://www.mizuho-ls.co.jp/en/sustainability.html