



Basic Policy against Anti-Social Forces

The Bank of New York Mellon Securities Company Japan Ltd. (hereinafter referred to as the "BNYMSJ") hereby declares its basic policy against Anti-Social Forces ("ASF") as follows.

1. MEASURES AS ORGANIZATION

BNYMSJ shall take actions against the Anti-Social Forces by the initiative of the management as the organization not leaving it to person or section in charge. The management and administration in case of the unjust demand by the Anti-Social Force shall be taken by Compliance Officer.

2. COORDINATION WITH EXTERNAL EXPERT FUNCTIONS

BNYMSJ shall keep close relationship with external functions including the Police, the Promotion Center for Expulsion of Forces, lawyers etc so that BNYMSJ can receive appropriate advice and support.

3. CUTTING OFF THE RELATIONSHIP INCLUDING BUSINESS TRANSACTIONS

BNYMSJ shall cut off any relationship with Anti-Social Forces including business relations. BNYMSJ shall reject any unjust demand from Anti-Social Forces.

4. LEGAL ACTIONS FROM BOTH CIVIL AND CRIMINAL IN CASE OF EMERGENCY

BNYMSJ shall take actions aggressively from both Civil and Criminal against any unjust demand from Anti-Social Forces

5. PROHIBITION OF DEALS BEHIND THE SCENES AND PROVISION OF FUNDS

BNYMSJ shall not make any deals with Anti-Social Forces behind the scenes or provide funds to hide the fact even in case the unjust demands are based on misconducts under the business operations.