



Basic Policy on Fiduciary Duties

The Bank of New York Mellon Securities Company Japan Ltd.

The Bank of New York Mellon Securities Company, Limited (hereinafter, the "Company"), as a member of the **BNY Group** (*), shares the BNY Group's **mission** ("to help clients achieve their ambitions through the delivery of expert capabilities that power investment success"), **vision** ("to improve lives through investing"), and **values** ("passion for excellence, compliance with laws and regulations / fulfillment of social responsibility / practice of corporate ethics, strength through diversity, and the courage to evolve by taking risks").

In addition to the above, and taking into account the social responsibility of asset management, the Company will thoroughly implement the following **"Policy on Customer-Oriented Business Operations"** (hereinafter, the "Policy") in order to realize these principles.

The Company will also review this Policy on a regular basis and disclose the status of its initiatives.

(*) The **BNY Group** is the collective term for the group of companies whose ultimate parent company is **The Bank of New York Mellon Corporation**.

Pursuit of the Best Interests of Customers

(Corresponding to Principle 2 of the "Principles for Customer-Oriented Business Conduct")

The Company will conduct its business with high professional ethics, honesty, and fairness, and will strive to serve the best interests of its customers. To this end, the Company will leverage the expertise of the globally operating BNY Group to develop and provide high-quality financial products and services.

Appropriate Management of Conflicts of Interest

(Corresponding to Principle 3 of the "Principles for Customer-Oriented Business Conduct")

The Company will place the highest priority on customers' interests and appropriately manage transactions and other matters that may involve conflicts of interest. To this end, the Company will establish internal rules and regulations, including a conflicts of interest management policy, and will develop internal compliance and other control frameworks.

Clarification of Fees and Charges

(Corresponding to Principle 4 of the "Principles for Customer-Oriented Business Conduct")

The Company will provide customers with clear explanations of the fees and other costs associated with the financial products and services it offers, including what services such fees and costs are charged for.

Information Provision from the Customer's Perspective

(Corresponding to Principle 5 of the "Principles for Customer-Oriented Business Conduct")

The Company will provide customers with important information regarding the nature, features, and other relevant aspects of the financial products and services it offers in a clear and understandable manner from the customer's perspective. The Company will also provide various information, including market conditions related to such financial products and services, through appropriate means and at appropriate times.

Provision of Financial Products and Services Appropriate for Customers

(Corresponding to Principle 6 of the "Principles for Customer-Oriented Business Conduct")

The Company will strive to ensure that customers are able to use financial products and services appropriate to them. For this purpose, the Company will develop financial products and services reflecting customers' diverse needs and will proactively provide information through appropriate means so that customers properly understand the features of such financial products and services, including investment objectives and risk characteristics.

Appropriate Employee Incentives to Realize Customer-Oriented Business Operations

(Corresponding to Principle 7 of the "Principles for Customer-Oriented Business Conduct")

In order to foster a corporate culture, including through the permeation of the Company's mission, vision, and values, and to realize customer-oriented business operations, the Company will establish frameworks for motivation, including compensation and performance evaluation systems, as well as periodic employee training.

Matters Not Applicable to the Company under the "Principles for Customer-Oriented Business Conduct"

Of the matters set forth in the "Principles for Customer-Oriented Business Conduct," the following are not addressed by the Company for the reasons stated below:

- Principle 5 (Note 2): The Company does not sell or recommend multiple financial products or services as a package.
- Principle 6 (Note 1): The Company does not directly sell or recommend financial products or services to general investors.
- Principle 6 (Note 2): The Company does not sell or recommend multiple financial products or services as a package.

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End

Disclosure