



BNY Group Policy on Customer Harassment

1. Introduction

BNY Group is committed to sincerely addressing the diverse needs of our clients, providing high-quality products and services as a trusted partner, and contributing to the sound development of the capital markets.

To fulfill this responsibility, it is essential that employees are able to work in a safe workplace environment while maintaining both physical and mental well-being.

In recent years, the increasing seriousness of customer harassment has become a social issue. While our Group takes customer feedback seriously and uses it for improvement, we will also respond firmly as an organization to conduct that constitutes customer harassment. In order to protect the dignity and safety of our employees, we hereby establish this Group policy for responding to customer harassment.

2. Definition of Customer Harassment

Customer harassment refers to complaints or behavior from customers or other parties in which the substance of the demand is not considered reasonable, or where, even if the demand itself may be reasonable, the means or manner used is socially inappropriate and may harm the working environment of employees.

Examples of conduct that may constitute customer harassment

The following are illustrative examples and are not exhaustive:

- Illegal acts such as violence, threats, intimidation, or coercion
 - Abusive language, personal attacks, discriminatory or sexual remarks or behavior, and stalking
 - Prolonged detention, persistent inquiries, or repeated demands
 - Defamation or slander on social media, or the exposure of personal information
 - Demands for money, goods, or special treatment that are socially unreasonable
 - Conduct that inconveniences other customers or interferes with business operations
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3. Response to Customer Harassment

If conduct deemed to constitute customer harassment is identified, the Group will respond firmly as an organization. In cases where such conduct continues or is judged to be particularly malicious, we may terminate our response and coordinate with relevant authorities, including the police and legal counsel, and take strict action, including legal measures.

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