

# Social

## Human Rights

### Position on Human Rights

The Tokyo Century Group's position on human rights is expressed in its Human Rights Policy as well as its Corporate Code of Conduct (4. Respect for Human Rights) and Our Action Guidelines (3. We will respect human rights and human dignity and create a rewarding working environment.). We have declared our commitment to promoting respect for human rights in our business activities and expect our customers, suppliers, and other stakeholders to do so as well. In terms of financing and investment, we have established the Tokyo Century Group Environmental and Social Management Policy for Financing and Investment Activity, which clearly states that we will restrict financing and investment in businesses that have a significantly negative impact on the environment and society, based on the Basic Environmental Policy and the Human Rights Policy. We prohibit financing and investment in businesses associated with serious human rights violations, such as forced labor, child labor, and human trafficking, and in businesses involved in the production of inhumane weapons, such as chemical, biological, and nuclear weapons, as well as cluster munitions.

In addition, we comply with the Credit Policy, which indicates our basic stance on and approach to credit operations common to officers and employees. We have also adopted the perspective of respect for human rights as one of the criteria for evaluating credit transactions, which must be confirmed for every transaction.

### Policies

#### Tokyo Century Group Human Rights Policy

We are mindful of corporate social responsibility, offer high expertise and a wide range of unique financial services by leveraging our flexible business domain, and have set out in our management philosophy that we will contribute to the creation of an environmentally sound, sustainable economy and society that enables economic development through the effective use of resources.

We have formulated this Human Rights Policy in accordance with our management philosophy and promote respect for human rights throughout our business activities. Recognizing respect for human rights as a key issue, we will cultivate a corporate culture that allows diverse human resources to fully demonstrate their skills and individual characteristics to become a company where all officers and employees can hone their expertise and experience growth as well as a sense of pride.

#### 1. Scope

This Human Rights Policy applies to all officers and employees of the Tokyo Century Group. We expect all of our stakeholders, including customers and suppliers of Group companies, to respect human rights.

#### 2. Affirmed international standards

We endorse and have signed the United Nations Global Compact. We also refer to the International Bill of Human Rights (Universal Declaration of Human Rights and International Covenants on Human Rights), the UN Guiding Principles on Business and Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work\* in implementing initiatives for respecting human rights.

\* Freedom of association and the right to collective bargaining, elimination of all forms of forced or compulsory labor, the effective abolition of child labor, elimination of discrimination in respect of employment and occupation, and equal remuneration for work of equal value

#### 3. Legal compliance

We comply with the relevant laws and regulations in each country or region where we operate. Where there is a conflict between internationally recognized standards and regional laws or regulations, we will find a way to respect international standards.

#### 4. Where the policy stands

This Human Rights Policy was established after deliberation by the Management Meeting followed by approval by the Board of Directors.

#### 5. Human rights of all officers and employees

We respect the human rights of all officers and employees and strive to create a vibrant, rewarding working environment where everyone's human rights and human dignity is respected. Furthermore, we promote diversity and inclusion in accordance with the separately established Basic Diversity Policy and foster a corporate culture that enables diverse talent to thrive in an environment free from discrimination based on race, religion, gender, age, sexual orientation, disability, and nationality.

#### 6. Human rights due diligence

We recognize that our businesses and services have the potential to cause or contribute to adverse impacts on human rights in any domain, and we conduct appropriate due diligence to prevent or mitigate such impacts associated with our business activities.

Policies	<p><b>7. Remedy</b> If we find that our business has caused or contributed to adverse impacts on human rights, we will strive to provide a remedy to those affected.</p> <p><b>8. Dialogues with stakeholders</b> We will conduct dialogues with stakeholders on our human rights initiatives.</p> <p><b>9. Communication and education</b> We engage in communication and education to ensure that all officers and employees understand the importance of respecting human rights and that the Human Rights Policy is incorporated in all aspects of our business activities. Additionally, we will conduct compliance-related training to confirm that we will not tolerate any discrimination or harassment and that our officers and employees will fully comply with related laws.</p> <p><b>10. Information disclosure</b> We strive to ensure that shareholders understand our initiatives based on the Human Rights Policy by disclosing information on our website and other media.</p>								
Corporate Code of Conduct and Our Action Guidelines (human rights)	<p>The following provisions related to respect for human rights can be found in Tokyo Century's Corporate Code of Conduct and Our Action Guidelines.</p> <p><b>Corporate Code of Conduct</b> 4. Respect for Human Rights The Tokyo Century Group respects the human rights of all people and promotes diversity to nurture a corporate culture that encourages personnel with diverse characteristics to thrive.</p> <p><b>Our Action Guidelines</b> 3. We will respect human rights and human dignity and create a rewarding working environment. We will respect our mutual human rights and human dignity and strive to create a vibrant, rewarding working environment where discrimination and harassment have no place.</p>								
Signing of the United Nations Global Compact	<p>Tokyo Century is a signatory to the United Nations Global Compact and endorses the compact's Ten Principles* in the four areas of human rights, labour, environment, and anti-corruption. Through ongoing efforts to live up to these principles, we aim to contribute to the creation of an environmentally sound, sustainable economy and society.</p> <p><small>* The Ten Principles of the United Nations Global Compact are based on the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention against Corruption.</small></p>								
Human rights training and educational activities	<p>All officers and employees submit a Compliance Confirmation Form each year, pledging their commitment to the Corporate Code of Conduct and Our Action Guidelines, which include our human rights policies. In addition, the Compliance Handbook, which has been published in Japanese and English, can be read at any time by all domestic and overseas officers and employees on the Company intranet. We also conduct the following training and educational activities to foster awareness of respect for human rights.</p> <table border="1"> <thead> <tr> <th>Target</th><th>Major Themes</th></tr> </thead> <tbody> <tr> <td>All officers and employees (Companywide online training and training according to job level)</td><td> <ul style="list-style-type: none"> <li>Human rights risks in business activities, business and human rights, and human rights initiatives activities</li> <li>Prohibition of harassment (sexual harassment; abuses of power; harassment for pregnancy, childbirth, childcare leave, family care leave, etc.; harassment associated with teleworking), Psychological safety</li> <li>Understanding of the Tokyo Century Group Environmental and Social Management Policy for Financing and Investment Activity</li> </ul> </td></tr> <tr> <td>Members of divisions and branch offices (individual workplaces)</td><td>Prohibition of harassment, related laws and regulations, prevention guidelines, basic stance on prevention of occurrence, etc.</td></tr> <tr> <td>Staff responsible for human rights at Group companies</td><td>Basic knowledge of human rights</td></tr> </tbody> </table>	Target	Major Themes	All officers and employees (Companywide online training and training according to job level)	<ul style="list-style-type: none"> <li>Human rights risks in business activities, business and human rights, and human rights initiatives activities</li> <li>Prohibition of harassment (sexual harassment; abuses of power; harassment for pregnancy, childbirth, childcare leave, family care leave, etc.; harassment associated with teleworking), Psychological safety</li> <li>Understanding of the Tokyo Century Group Environmental and Social Management Policy for Financing and Investment Activity</li> </ul>	Members of divisions and branch offices (individual workplaces)	Prohibition of harassment, related laws and regulations, prevention guidelines, basic stance on prevention of occurrence, etc.	Staff responsible for human rights at Group companies	Basic knowledge of human rights
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Management of Human Rights Risks	<p>Tokyo Century manages human rights risks as part of comprehensive risk management through a system for understanding and evaluating risks associated with the Group as a whole, including human rights risks, and for responding appropriately from both a qualitative and quantitative perspective as needed. The system is implemented by the Comprehensive Risk Management Committee, which periodically reports on the status of its activities to the Management Meeting and to the Board of Directors.</p> <p>We monitor human rights risks as a facet of this system by classifying them as "human rights and workplace environment risks" under "operational risks" and verify the appropriateness of our response thereto.</p>								

**System for addressing human rights violations (grievance mechanism)**

**1. Officers and Employees of Group Companies**

As a means of addressing actual compliance violations, including harassment and human rights violations, or concerns over possible compliance violations, the Tokyo Century Group operates an internal reporting system available to all officers and employees at Group companies in Japan and overseas (directors, executive officers, employees, contract employees, temporary employees, seconded employees, part-time employees, and others), as well as to former employees up to a year after their resignation.

Moreover, we make the utmost effort to ensure the anonymity of whistleblowers and maintain the confidentiality of their reports, and we will take remedial measures for victims in cases where human rights violations are found as a result of investigations into the cases reported.

We conduct an annual compliance survey of all officers and employees, which features questions regarding compliance concerns including about human rights violations, and conduct hearings depending on the content of the responses to prevent problems from occurring.

**2. Customers and External Stakeholders**

As part of our efforts to promote respect for human rights in our business activities, we have established contact points for human rights consultation for customers and other external stakeholders.

Regardless of whether you do business with the Group or not, if you have noticed any human rights violations by Group companies or their officers or employees, please notify the following contact points. We will look into the matter and reply to you with the results of our investigation.

Contact Point for Human Rights Consultation  
Compliance Office in the Risk Management Division of Tokyo Century  
For consultations, please refer to the following website.  
<https://www.tokyocentury.co.jp/en/contact/humanrights/>

**Human rights due diligence**

We conduct PDCA cycles to effectively analyze, identify, and assess the negative human rights impacts associated with the Tokyo Century Group's business activities and take corrective action to prevent or mitigate such impacts, with the cooperation of an external specialized organization.

**1. Human Rights Due Diligence by the Company and Its Consolidated Subsidiaries**

Tokyo Century Corporation and all of its consolidated subsidiaries in Japan and overseas implemented human rights due diligence.

**○Our Due Diligence Process**

After generating a long list of human rights risks related to our business, we narrowed them down to the items that were most relevant by taking into consideration the nature of our Group business and our stakeholders, and we identified human rights issues that require our vigilance. Then, to understand the current status of these issues, we analyzed the content of internal reporting cases as well as the results of the employee awareness and compliance surveys and conducted a questionnaire survey and interview at each company.

**○Identified issues**

No material risks emerged during the process of risk identification, which confirmed that Tokyo Century has properly established and maintained its human rights policies, the operation of its internal reporting system as a relief mechanism, its reporting systems for compliance violations during contingencies as well as incidents and accidents, and its human rights educational system.

On the other hand, we did note some room for improvement as a parent company, in the way we sought to grasp the standard operations of each subsidiary with regard to their awareness of harassment and human rights risks, such as for occupational health and safety and working hours. There is also room for improvement in how we disseminate and monitor the implementation of our policies at each subsidiary.

We will address these issues through such actions as developing and strengthening ways to disseminate information as well as reviewing the content and increasing the frequency of monitoring.

**2. Human Rights Risk Assessment of Investee Companies**

We assess human rights risks during the decision-making process for making large investment and loans and when monitoring those that have been implemented.

The assessment focuses on concerns such as the approach to human rights risks, any incidence of past violations, human rights risks that may arise because of the investment or loan, and measures to prevent and mitigate such risks.

The discovery of any past evidence of child labor, forced labor, or human trafficking will, in principle, make the prospective business ineligible for investment. Similarly, if the target business is found likely to be associated with any of these three violations or with a potential life-threatening accident in the future, the effectiveness of mitigation measures will be carefully verified before confirming that the investment or loan can be made.

We will continue our efforts to ensure respect for human rights and to realize sustainable businesses by verifying human rights issues as they arise in the various aspects of our corporate operations and by consistently implementing PDCA cycles to prevent or mitigate any negative impacts on human rights.

Policies	<p><b>Basic Diversity Policy</b></p> <p>The Tokyo Century Group will work alongside customers in pursuit of their growth as a highly specialized and unique financial services company and further expand its business domains and develop its global business. We will promote diversity to enable employees with diverse capabilities and personalities to demonstrate flexible thinking and dynamic action to better serve the varied needs of our customers by consistently providing services with high added value.</p> <p><b>1. Nurturing Our Corporate Culture</b></p> <p>Each employee will understand the importance of diversity and nurture a corporate culture that encourages personnel with diverse characteristics to thrive.</p> <p><b>2. Promoting the Active Participation of Diverse Human Resources</b></p> <p>We will promote the hiring, development, and appointment of human resources from diverse backgrounds, regardless of race, religion, gender, age, sexual orientation, disability, or nationality.</p> <p><b>3. Supporting Career and Ability Development</b></p> <p>We will support the career and ability development of each employee to encourage each individual to fully demonstrate their ability and individuality.</p> <p><b>4. Enhance Balance Between Work and Private Life</b></p> <p>We will enhance support for balancing work and private life so that each employee can work flexibly as appropriate to their life circumstances.</p>										
Promotion system	<p>Tokyo Century encourages its diverse workforce to proactively demonstrate their capabilities and personalities. To support their efforts, we established the Diversity Promotion Office within the Personnel Division on April 1, 2015, so as to nurture a corporate culture that encourages employees with diverse characteristics to thrive. Under our Basic Diversity Policy, we are implementing a variety of related measures to promote diversity.</p>										
Diversity training	<p>Diversity training is conducted to foster greater understanding of diversity among all officers and employees. Topics related to diversity are incorporated into basic onboarding training for new-graduate and mid-career hires, and diversity-related e-learning programs are administered to all officers and employees. In addition, diversity seminars are arranged at which external instructors are invited to hold lectures and lead discussions.</p> <table> <tr> <th>Target</th><th>Topics</th></tr> <tr> <td>All officers and employees</td><td>           Basic diversity knowledge, fostering of understanding regarding diversity            Diversity promotion and management strategies            Tokyo Century's Basic Diversity Policy            Flexible workstyles            Balancing of work and long-term care for family members and Tokyo Century's support systems            Understanding of the LGBTQ+ community         </td></tr> <tr> <td>Female employees</td><td>           Fostering of understanding regarding diversity            Women's career development            Understanding of importance of viewing issues from a broader perspective            Development of action plans for addressing issues         </td></tr> <tr> <td>Employees with up to nine years of service (rank-based training)</td><td>Workstyle reforms (high-productivity workstyles)</td></tr> <tr> <td>Non-Japanese staff</td><td>Fostering of mutual understanding and enhancement of communication</td></tr> </table>	Target	Topics	All officers and employees	Basic diversity knowledge, fostering of understanding regarding diversity Diversity promotion and management strategies Tokyo Century's Basic Diversity Policy Flexible workstyles Balancing of work and long-term care for family members and Tokyo Century's support systems Understanding of the LGBTQ+ community	Female employees	Fostering of understanding regarding diversity Women's career development Understanding of importance of viewing issues from a broader perspective Development of action plans for addressing issues	Employees with up to nine years of service (rank-based training)	Workstyle reforms (high-productivity workstyles)	Non-Japanese staff	Fostering of mutual understanding and enhancement of communication
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Support for the LGBTQ+ community	<p>The Tokyo Century Group distributes its Compliance Handbook to all officers and employees. This handbook clearly indicates our stance against all forms of harassment, including sexual harassment, abuse of power, and Support for the LGBTQ+ community the negative treatment of women in relation to pregnancy or child-rearing. It also describes our prohibition of discrimination of members of the LGBTQ+ community. Factual awareness in this regard is promoted through concrete examples, and training is conducted for all officers and employees to foster an accurate understanding of the LGBTQ+ community.</p>										
Promotion of active participation of global human resources	<p>The Tokyo Century Group has expanded its overseas network to more than 30 countries and regions around the world through an alliance strategy in collaboration with prime local partners overseas. As developing global human resources is essential for its continued growth, the Group continues to proactively hire non-Japanese employees in Japan and recruit local hires in overseas markets with the aim of developing and appointing diverse human resources who thrive around the globe. In addition, Tokyo Century is working to develop human resources who can play an active role globally in the future by establishing an international course for new graduates, actively promoting an overseas trainee system and overseas assignment for junior employees, and organizing various training programs for employees at the head office and for overseas local hires.</p>										

## Employment of people with disabilities

Tokyo Century seeks talented individuals from an extensive array of backgrounds and actively employs people with disabilities in order to provide a workplace where highly motivated people can flourish. The Company also meets the requirements for the ratio of employees with disabilities, as established in the Act to Facilitate the Employment of Persons with Disabilities (non-consolidated ratio of employees with disabilities of 3.26% as of June 1, 2024).

As an effort to further promote the employment of people with disabilities, in April 2019 Tokyo Century hired six staff members (people with mental disabilities) and opened the TC Work Happiness Farm in Funabashi City, Chiba Prefecture, with two teams. In conjunction with the expansions of this plantation undertaken in February 2021 and June 2023, Tokyo Century hired additional members to staff the plantation, which is currently operated by 19 individuals organized into five teams from the Company (as of March 31, 2024).

The TC Work Happiness Farm provides a secure and fulfilling working environment for people with disabilities on a long-term basis. Specifically, the plantation grows vegetables in a farm house designed under the motto of safety and cleanliness and donates the harvested vegetables to the Second Harvest Japan (2HJ) as part of our social contribution activities.

Established in March 2002, [2HJ](#) was Japan's first food bank. A food bank is a charitable organization that distributes food to those who are going hungry. In the case of 2HJ, this organization redistributes a variety of food donated from food manufacturers, wholesalers, farmers, and individuals that would normally be disposed of, despite still being edible, to welfare agencies, orphanages, and women's shelters; people with disabilities; impoverished individuals; and others in need. The organization also provides support for individuals impacted by the Great East Japan Earthquake and the 2024 Noto earthquake.

## Empowerment of female employees

Based on the Act on the Promotion of Female Participation and Career Advancement in the Workplace, Tokyo Century empowers its female employees and has drawn up an action plan designed to enable each and every employee to work flexibly and in a diverse number of ways.

### Action Plan for the Promotion of Women's Active Participation\*

Plan Period	Quantitative Targets
April 1, 2023–March 31, 2028	<ul style="list-style-type: none"> <li>● Maintain a ratio of women among new-graduate hires of at least 40%</li> <li>● Increase the ratio of female managers among all managers to at least 30% by 2030</li> <li>● Maintain a ratio of childcare leave acquisition by men of 100%</li> <li>● Maintain a ratio of annual paid leave acquisition of at least 70%</li> </ul>

\* This plan has been disclosed through the Ministry of Health, Labour and Welfare's database of companies actively empowering female employees (in Japanese only).  
<http://positive-ryouritsu.mhlw.go.jp/positivedb/detail?id=985>

## Promotion of women to management and officer positions

Tokyo Century established its Action Plan on the Promotion of Women to Officer and Management Positions in October 2014 in order to steadily increase its number of female officers and managers through the active employment, training, and promotion of highly motivated and talented women.

### Action Plan on the Promotion of Women to Officer and Management Positions\*

Targets
<ul style="list-style-type: none"> <li>● Maintain a ratio of women among new-graduate hires of at least 40%</li> <li>● Increase the ratio of female managers among all managers to at least 30% by 2030</li> </ul>

Furthermore, in order to ensure that all employees can work comfortably through every stage of life, we are continuously striving to reform our workplace culture, support career and ability development, and enhance and promote the use of systems that aid in balancing work and private life.

(Two female directors and 63 female managers, making for a ratio of female managers among all managers of 12.0%, as of March 31, 2024)

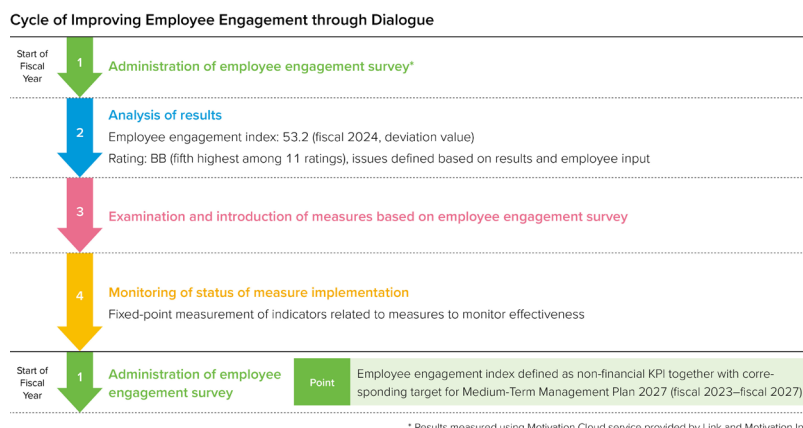
\* The Action Plan on the Promotion of Women to Officer and Management Positions is also disclosed on the website for Keidanren (Japan Business Federation) (in Japanese only).  
<http://www.keidanren.or.jp/policy/woman/ap10425.html>

## Human Resource Utilization

Human resource development approach	<p><b>Approach toward Human Resource Development</b></p> <p>Tokyo Century is committed to fostering human resources who can refine their fundamental skills for interacting with society while also growing and transforming to bring about change.</p> <ol style="list-style-type: none"> <li>1. Propensity for self-transformation: Exceptional ability to evolve and transform into the type of person one aspires to be</li> <li>2. Creativity: An excellent capacity to overcome one's past limitations to create new value</li> <li>3. Ambition: A force propelling one forward based on a robust sense of curiosity and drive</li> </ol>
Workplace development approach	<p><b>Approach toward Workplace Development</b></p> <p>Tokyo Century endeavors to develop a workplace environment that ensures highly capable organizations while allowing employees to work based on unrestrained ideas.</p> <ol style="list-style-type: none"> <li>1. Development of a workplace environment in which diverse human resources can feel energized, motivated, and optimistic in their work</li> <li>2. Provision of opportunities for education and reskilling based on changes in social trends, employee life stages, and the operating environment</li> <li>3. Cultivation of an atmosphere conducive to smooth communication among employees</li> </ol>
Support for Career	<p>Tokyo Century believes that personnel are the real assets and driving force for sustainable growth in a company. In order to encourage each and every employee to demonstrate their abilities and individuality, we support voluntary career and ability development and conduct various training programs.</p> <p><b>Types of Training</b></p> <p>Training for junior employees by year of employment, management training, career design training, global human resource cultivation (external training, overseas trainee dispatch), skills development support, etc.</p>
Promotion system	<p>To support employees in developing their careers throughout their professional lives, Tokyo Century has established the Career Design Office within the Personnel Division to help employees be the principal proponent in planning, designing, and developing their careers. In addition, Tokyo Century provides helpdesks for employees of specific age groups that can be used for training, interviews, or voluntary training as part of its efforts to support employee career development.</p>
Skills development support	<p>Tokyo Century aids employee learning through a bonus system for employees who have completed distance learning courses and through a subsidy system for employees who have obtained qualifications relevant to their work.</p>
360° evaluations	<p>We implement 360° evaluations as part of our efforts to improve employee engagement, which is imperative to reinforcing our management foundation, and to develop section managers who underpin organizational management with a focus on smooth workplace relationships. The results of these evaluations are communicated to the individuals in question and to their supervisors.</p>
Career Challenge Program	<p>The Career Challenge Program is an internal recruitment system designed to provide employees with opportunities for charting their own career course.</p>
TC Biz Challenge Project	<p>The TC Biz Challenge Project is a new business proposal initiative that is designed to empower employees to boldly tackle new challenges without fear of failure. We remain committed to tackling new challenges going forward.</p>

## Improvement of Employee Engagement

Medium-Term Management Plan 2027 defines the employee engagement index as a non-financial KPI. This index is measured through annual employee engagement surveys. By analyzing the results of these surveys, we are able to identify issues and implement improvement measures to further heighten the employee engagement index. Based on the insight gained through employee engagement surveys, current issues and future initiatives are discussed by the Management Meeting and the Board of Directors on an ongoing basis so that identified issues can be addressed as top management priorities.



## Work-life balance support

Tokyo Century promotes work-life balance so that all employees can work flexibly to suit their life circumstances.

### Major Work-Life Balance Support Systems

Target	System	Period
Childbirth and childcare	Pre-childbirth leave	Six weeks prior to childbirth
	Post-childbirth leave	Eight weeks after childbirth
	Childbirth leave for fathers	Four weeks during first eight weeks after childbirth
	Childcare leave	Until child reaches the age of two years and six months
	Special leave to visit a hospital, such as for physical examinations	Until one year after pregnancy and childbirth (only days required)
	Special leave for childbirth by a spouse	One month prior to childbirth until two weeks after childbirth (five days in total)
	Nursing leave	Until child starts elementary school (five days per year per child; leave should be taken per day, half a day, or hour)
	Exemption from overtime	Until child reaches the third year of elementary school
	Bringing forward of work start/end time	Until child reaches the third year of elementary school (up to two hours)
	Pushing back of work start/end time	Until child reaches the third year of elementary school (up to two hours)
	Shortened working hours	Until child reaches the third year of elementary school (up to 75-minute reduction)
Nursing	Family care leave	Up to one year in total (the number of applications is not limited)
	Nursing leave	Up to five days per family member who is under care; leave should be taken per day, half a day, or hour
	Exemption from overtime	Until the care for the family member in question ends
	Bringing forward of work start/end time	Three years from the start date (up to two hours, but the number of applications is not limited)
	Pushing back of work start/end time	Three years from the start date (up to two hours, but the number of applications is not limited)
	Shortened working hours	Three years from the start date (up to two hours, but the number of applications is not limited)

## Reduction of Long Working Hours and Work-Life Balance

Tokyo Century promotes work streamlining and strives to improve work-life balance through such means as ensuring sufficient time for self-development, family, and friends by reducing overtime hours. During summer (July - August), Tokyo Century promotes leaving the office on time, as well as following Cool Biz protocols.

In addition, based on the Labour Standards Act, Tokyo Century has concluded an Agreement on Overtime Work and Working on Holidays (so called “36 Agreement”) with the labour union. In relation to other working conditions and others, Tokyo Century complies with the Labour Standards Act.

Tokyo Century Group pays living wage which exceeds the legal minimum wage in compliance with the laws of each country and does not practice unreasonable wage reduction.



<p><b>Policies</b></p>	<p><b>Basic Policy on Health and Productivity Management</b></p> <p>Tokyo Century will work alongside customers in pursuit of their growth as a highly specialized and unique financial services company and will contribute to the creation of an environmentally sound, sustainable economy and society. Under this management philosophy, we intend to achieve further growth and increase our corporate value by promoting partnership strategies to continue creating new businesses. To this end, it is important to develop an environment in which all of our human resources, who represent our greatest assets, can work vigorously in good health, both physically and mentally, and fully demonstrate their individuality and all their abilities. We therefore strive to maintain and improve the well-being of our officers and employees and their families with the recognition that health management is a corporate management issue.</p> <ol style="list-style-type: none"> <li><b>1. Fostering health awareness</b> We will provide information on mental and physical well-being and support the self-sustaining efforts of each officer and employee to foster awareness of prioritizing health.</li> <li><b>2. Identifying health issues</b> We will strive to understand issues identified from the results of physical checkups and stress checks.</li> <li><b>3. Health management and measures</b> We will take action to improve and rectify each health issue and properly manage health-related information.</li> <li><b>4. Supporting the balance between work and treatment of disease</b> We will promote initiatives for preventing and detecting diseases at an early stage while supporting the balance between work and treatment of disease.</li> </ol>
<p><b>Health and productivity management initiatives</b></p>	<p><b>Health and Productivity Management Initiatives</b></p> <ol style="list-style-type: none"> <li><b>1. Fostering health awareness</b> <ol style="list-style-type: none"> <li>(1) Collaborate with health insurance associations to help form sound habits by providing applications that encourage healthy activities.</li> <li>(2) Work with industrial physicians and occupational health nurses to continue to provide information through e-learning and other means with the aim of raising health awareness.</li> <li>(3) Introduce the details of the health and productivity management initiatives to affiliated companies and promote mutual information sharing.</li> <li>(4) Disseminate information on our initiatives both internally and externally through our corporate website.</li> </ol> </li> <li><b>2. Identifying health issues</b> <ol style="list-style-type: none"> <li>(1) Conduct regular physical check-ups, aiming for 100% participation.</li> <li>(2) Implement stress checks, aiming for 100% participation.</li> <li>(3) Disclose the results of regular physical check-ups and stress checks both internally and externally.</li> </ol> </li> <li><b>3. Health management and measures</b> <ol style="list-style-type: none"> <li>(1) Provide specific health guidance to officers and employees diagnosed with metabolic syndrome as a result of regular physical checkups. Aim to have 80% or more of them receive the guidance so that they can improve their dietary and other lifestyle habits.</li> <li>(2) Provide opportunities to see industrial physicians for employees who have been diagnosed with a high level of stress as a result of stress checks, and also recommend the use of external consultation services.</li> <li>(3) Publicize health consultation services provided by the Personnel Division, industrial physicians, occupational health nurses, health insurance associations, other health organizations so that employees can relieve their mental and physical health concerns or clear up related questions.</li> <li>(4) Properly manage the working hours of all employees to prevent long working hours.</li> <li>(5) Recommend that employees telework, stagger their work hours, or take hourly leave to prevent the spread of infectious diseases.</li> <li>(6) Address women's health issues by providing seminars and subsidizing the cost of gynecological cancer screening tests.</li> <li>(7) Implement measures to improve dietary habits and support smoking cessation.</li> <li>(8) Subsidize the cost of medical examinations for officers and employees identified as needing a re-examination or more thorough examination as a result of regular physical checkups.</li> </ol> </li> <li><b>4. Supporting the balance between work and treatment of disease</b> <ol style="list-style-type: none"> <li>(1) Recommend that employees telework, stagger their work hours, or take hourly leave so that they can continue to work while receiving treatment for disease.</li> <li>(2) Provide support for employees on mental health leave through a return-to-work support system so that they can return to work smoothly.</li> <li>(3) Provide financial support through an orphans' pension program for education of the children of employees in the event of their death or severe disability.</li> <li>(4) Recommend and subsidize voluntary medical screenings such as complete medical checkups and cancer exams to detect and treat diseases at an early stage.</li> <li>(5) Provide the special reserve leave system to support the employees undergoing infertility treatment so that they can continue to work insofar as possible.</li> </ol> </li> </ol>



## Social Contribution Activities

Leave system for volunteer activities	In 2009, Tokyo Century introduced a system that can be used by employees to acquire special leave for volunteer activities that fall into one of the following four categories: 1. Environmental preservation activities, 2. Community outreach activities, 3. Social welfare activities, and 4. Other activities authorized by the Company.
Social Contributions through Donations	<p>In accordance with its Management Policy and Management Philosophy, the Tokyo Century Group makes donations targeting the priority areas of the environment, social welfare, education, and disaster relief. The goals of these donations are to fulfill our social mission and responsibilities and to contribute to the development and advancement of society.</p> <p>The organizations in each priority area to which donations were made in fiscal 2023 are as follows.</p> <ol style="list-style-type: none"> <li>1. Environment: Nature Conservation Society of Japan (forest preservation, biodiversity preservation, marine environment preservation, and other nature preservation activities across Japan)</li> <li>2. Social welfare: Japanese Foundation for Cancer Research (cancer research)</li> <li>3. Education: Katariba (programs for supporting and providing spaces for children, classes performed at schools, and support programs for children who are reluctant to attend school)</li> <li>4. Disaster relief: Central Community Chest of Japan (disaster relief volunteer and NPO support fund)</li> </ol> <p>Note: Descriptions in parentheses represent the primary activities of each organization.</p> <p>Tokyo Century donated a total of ¥16,613,700 in fiscal 2023. For information on major donations in fiscal 2023, please refer to the "Together with Local Communities" section of Tokyo Century's corporate website.  <a href="https://www.tokyocentury.co.jp/en/sustainability/esg/social/community.html#anc_FY2023">https://www.tokyocentury.co.jp/en/sustainability/esg/social/community.html#anc_FY2023</a></p>
Disaster relief	<p>In response to the serious damage caused by the 2024 Noto earthquake, which struck on January 1, 2024, with its epicenter in the Noto Peninsula of Ishikawa Prefecture, Tokyo Century Corporation; Nippon Car Solutions Co., Ltd.; and Nippon Rent-A-Car Service, Inc. donated a total of ¥11 million to the Japanese Red Cross Society and to Wajima City, Ishikawa Prefecture, to provide relief to those impacted by the disaster. Moreover, we partnered with FamilyMart Co., Ltd., to offer a disaster recovery support package for FamilyMart franchisees requiring monetary support to renovate their location or temporarily halt operations due to the impacts of the 2024 Noto earthquake. Applications for this package began being accepted in February 2024. The disaster recovery support package offers special, time-limited interest rates for installment plans for use in interior and other renovations by FamilyMart franchisees that have been operating for around 10 years and that need support in rebuilding their stores.</p> <p>Meanwhile, the Automobility segment has been expanding its electric vehicle (EV) initiatives. One facet of these efforts is supplying business continuity products that utilize EVs as a source of emergency power. This approach has already been used to support post-disaster reconstruction, as we supplied such EVs to Chiba Prefecture during a prolonged blackout resulting from Typhoon Faxai in 2019. These EVs were used as an emergency power source for social welfare facilities. In July 2023, Nippon Rent-A-Car Service, Inc., concluded a disaster relief support coordination agreement with Yakushima Town, Kagoshima Prefecture. Under the agreement, the EV fleet of Nippon Rent-A-Car Service's office in Yakushima Town will be mobilized in the event of a large-scale earthquake, storm, flood, or other natural disaster to provide power to disaster response headquarters and evacuation sites. Other forms of coordination will also be pursued in times of disasters.</p> <p>Furthermore, Tokyo Century is supporting the Great East Japan Earthquake Reconstruction Support-Coastal Forest Restoration Project through ongoing donations to OISCA (The Organization for Industrial, Spiritual and Cultural Advancement-International).</p>
Disaster preparedness measures	<p>Tokyo Century was named a model company in Tokyo for limiting instances of all employees leaving work at the same time during a natural disaster in fiscal 2021. This honor was bestowed on Tokyo Century and 38 other companies among the 140 companies certified under Tokyo's system for recognizing companies at which all employees leave work at the same time during natural disasters prior to 2023 to recognize the highly effective and influential initiatives of these companies.</p> <p>For more information, please refer to the following website (in Japanese only).  <a href="https://www.bousai.metro.tokyo.lg.jp/kitaku_portal/1000048/1006510/1006512/index.html">https://www.bousai.metro.tokyo.lg.jp/kitaku_portal/1000048/1006510/1006512/index.html</a></p> 
Contributions through shareholder incentive systems	As a form of contribution through its shareholder incentive systems, Tokyo Century donates an amount equivalent to 5% of the value of shareholder incentives (Quo Card prepaid cards) each fiscal year to organizations engaged in social contribution activities. In fiscal 2023, Tokyo Century donated amounts equivalent to 2.5% of the value of shareholder incentives to the Japan Service Dog Association, which is engaged in the training of service dogs, and to the Japan Rescue Association, which facilitates the training and deployment of disaster search dogs.

<p><b>Support for education of the next generation</b></p>	<p>The Tokyo Century Group takes part in the education of the next generation around the world through pro bono and other activities.</p> <p><b>Initiatives in Japan</b></p> <ul style="list-style-type: none"> <li>• Dispatch of employees as lecturers to teach universities' industry research seminars (finance, leasing, sustainability) and career design and other seminars</li> <li>• Internship programs for junior high school students</li> </ul> <p><b>Overseas Initiatives</b></p> <ul style="list-style-type: none"> <li>• Arrangement of financial literacy lectures for elementary and high school and university students in Indonesia, etc.</li> </ul> <p>Another part of our efforts to support the education of the next generation is the provision of children's reading subsidies and the promotion of digital library services through donations to the ITOCHU Foundation.</p> <p>For more information on the Company's support for the education of the next generation, please refer to the "Social" tab on the "Sustainability Topics" section of Tokyo Century's corporate website.  <a href="https://www.tokyocentury.co.jp/en/sustainability/topics/">https://www.tokyocentury.co.jp/en/sustainability/topics/</a></p>
<p><b>Support for sports</b></p>	<p>Tokyo Century's sports support activities include acting as an official sponsor of the KAWASAKI FRONTALE J.League soccer team. In addition, the Company has concluded a top partnership agreement with Urayasu D-Rocks, a rugby team belonging to the Japan Rugby League One. Moreover, consolidated subsidiary TC Kobelco Real Estate Co., Ltd., is a gold partner of Kobelco Steelers, another Japan Rugby League One team. Tokyo Century has also concluded a sponsorship agreement with the Fukuoka SoftBank Hawks professional baseball team.</p>
<p><b>Support for the arts</b></p>	<p>The Company maintains a corporate membership to the Mitsubishi Ichigokan museum as part of its efforts to support the arts.</p> <p>In addition, we are supporting cultural activities through ongoing donations to the Shibusawa Eiichi Memorial Foundation, among other initiatives.</p>
<p><b>Clean-up activities, etc.</b></p>	<p>Tokyo Century Group officers and employees take part in clean-up activities as part of our efforts to coexist in harmony with local communities.</p> <p><b>Activities in Japan</b> Early-morning volunteer clean-up activities around our head office (Chiyoda Ward) and our Okachimachi office (Taito Ward)</p> <p><b>Overseas Activities</b> Participation in fish and shellfish release and coastal clean-up activities spearheaded by Sirindhorn international marine environment preservation center, located in Phetchaburi Province of Thailand, by employees of Thailand subsidiary in fiscal 2023 as part of volunteer clean-up activities included in CSR activities program each year</p> <p>For information on other sustainability topics, please refer to the following website.  <a href="https://www.tokyocentury.co.jp/en/sustainability/topics/">https://www.tokyocentury.co.jp/en/sustainability/topics/</a></p>

## Occupational Health and Safety

<p><b>Occupational Health and Safety</b></p>	<p>Based on Japan's Industrial Safety and Health Act, Tokyo Century has set up the Occupational Health and Safety Committee. We also engage in discussions on relevant themes determined on a monthly basis, such as physical and mental health, under the supervision of industrial physicians and occupational health nurses. The minutes and materials used in these discussions are made available on the Company intranet, where they can be viewed by officers and employees to contribute to higher occupational health and safety awareness.</p> <p>Meanwhile, EPC Japan K.K., a subsidiary of the Tokyo Century Group obtained ISO 45001 occupational health and safety management system certification in March 2024. The scope of this certification covers the company's IT asset disposition (ITAD) services, PC kitting services, and used equipment sales operations.</p> <p>Basic Occupational Health and Safety Policy of EPC Japan K.K. (in Japanese only)  <a href="https://www.tokyocentury.co.jp/assets/pdf/company/epc_japan_occupational_health_and_safety.pdf">https://www.tokyocentury.co.jp/assets/pdf/company/epc_japan_occupational_health_and_safety.pdf</a></p> <div data-bbox="1241 1783 1453 1910">  <p>OHS 796260 / ISO 45001</p> </div>
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## Human Resource Data

KPI <span>TC</span>	Target (Target year)	Subcategory		Fiscal 2021	Fiscal 2022	Fiscal 2023
Ratio of women among new hires (As of March 31 of each fiscal year; does not include contractors and temporary staff)	–	Women		11	26	30
		Total of men and women		43	88	85
		Ratio of women		25.6%	29.5%	35.3%
Ratio of women among new-graduate hires	Maintain rate of 40% (Fiscal 2027)	Women		9	16	25
		Total of men and women		17	38	47
		Ratio of women		52.9%	42.1%	53.2%
Ratio of women among mid-career hires	–	Women		2	10	5
		Total of men and women		26	50	38
		Ratio of women		7.7%	20.0%	13.2%
Ratio of women among newly hired employees (including mid-career hires)	–	Career track employees		23.8%	29.5%	25.7%
		Administrative employees		100.0%	–	100.0%
		Contractors		100.0%	0.0%	41.7%
		Total		28.9%	29.2%	35.3%
Average years of continuous employment by gender (As of March 31 of each fiscal year)	–	Women	Career track employees	11.2 years	9.8 years	9.3 years
			Administrative employees	19.6 years	20.6 years	21.2 years
			Total	17.1 years	16.7 years	16.9 years
		Men	Career track employees	17.3 years	16.9 years	17.3 years
			Administrative employees	–	–	–
			Total	17.3 years	16.9 years	17.3 years
Ratio of female managers among all managers (As of March 31 of each fiscal year)	30% or more (Fiscal 2030)	Women		45	57	63
		Total of men and women		466	482	525
		Ratio of women		9.7%	11.8%	12.0%
Ratio of women officers (As of March 31 of each fiscal year) (Includes non-full-time directors, corporate auditors, and executive officers)	–	Women		2	2	2
		Total of men and women		42	38	36
		Ratio of women		4.8%	5.3%	5.6%
Ratio of women in assistant manager position or equivalent (As of March 31 of each fiscal year)	–	Women		115	119	133
		Total of men and women		239	240	257
		Ratio of women		48.1%	49.6%	51.8%
Average overtime hours per month (labor outside legally designated hours)	–	Career track employees		16.5 hours	17.2 hours	16.8 hours
		Administrative employees		2.6 hours	2.5 hours	2.6 hours
		Total		11.2 hours	11.8 hours	11.6 hours
Ratio of successful job applicants by gender (including mid-career hires)	–	Women	Career track employees	72.1 times	21.8 times	26.9 times
			Administrative employees	1.0 times	–	17.6 times
			Contractors	2.5 times	–	1.2 times
			Total	55.9 times	21.8 times	20.7 times
		Men	Career track employees	41.8 times	18.6 times	20.1 times
			Administrative employees	–	–	–
			Contractors	–	17.0 times	1.0 times
			Total	42.3 times	18.6 times	17.3 times

KPI <span>TC</span>	Target (Target year)	Subcategory		Fiscal 2021	Fiscal 2022	Fiscal 2023
Ratio of men to women in hiring (including mid-career hires)	–	Career track employees		1.7	1.2	1.3
		Administrative employees		–	–	–
		Contractors		–	–	1.2
		Total		1.3	1.2	1.2
Ratio of women in labourers (As of March 31 of each fiscal year) (Consolidated-basis ratio of 35.4% as of March 31, 2024, excluding contractors and temporary staff)	–	Career track employees		12.0%	14.6%	14.7%
		Administrative employees		100.0%	100.0%	100.0%
		Contractors		29.4%	31.3%	34.2%
		Temporary staff		86.8%	90.5%	92.7%
		Total		30.7%	32.0%	32.7%
Employee turnover rate	–	Women		0.9%	0.9%	1.0%
		Men		4.5%	3.6%	4.0%
		Total		5.3%	4.4%	5.0%
Number of people leaving work for nursing care reasons	Maintain a nursing care turnover rate of zero (Fiscal 2027)	–		0	0	0
Ratio of employees with disabilities (As of June 1 of each fiscal year)	Maintain rate above legally mandated level of 2.7% (Fiscal 2027)	–		3.22%	2.86%	3.40%
Rate of employees undergoing regular health check-ups	100% (Fiscal 2027)	–		100.0%	100.0%	100.0%
Rate of employees undergoing stress checks	100% (Fiscal 2027)	–		98.6%	100.0%	100.0%
Rate of employees receiving specific health guidance	80% or more (Fiscal 2027)	Officers and employees subject to specific health guidance over age 40		81.7%	80.4%	Under tabulation
Ratio of continuous employment after ten year by gender (Fiscal 2021: Newly hired employees between fiscal 2010 and fiscal 2012) (Fiscal 2022: Newly hired employees between fiscal 2011 and fiscal 2013) (Fiscal 2023: Newly hired employees between fiscal 2012 and fiscal 2014)	–	Women	Career track employees	37.5%	60.0%	66.7%
			Administrative employees	50.0%	66.7%	–
			Total	42.9%	61.5%	66.7%
		Men	Career track employees	58.3%	65.4%	56.0%
			Administrative employees	–	–	–
			Total	58.3%	65.4%	56.0%
Rate of childcare leave acquisition by gender (Ratio of individuals acquiring childcare leave or leave for purpose of childcare)	Maintain rate of childcare leave acquisition by male employees of 100% (fiscal 2027)	Women	Career track employees	100.0%	100.0%	100.0%
			Administrative employees	100.0%	100.0%	100.0%
			Total	100.0%	100.0%	100.0%
		Men	Career track employees	100.0%	100.0%	100.0%
			Administrative employees	–	–	–
			Total	100.0%	100.0%	100.0%
Annual paid leave acquisition rate (Figures in parentheses represent average number of days of annual paid leave taken)	Maintain rate of 70% or more (fiscal 2027)	Career track employees		73.6%	75.4%	79.6%
		Administrative employees		80.3%	88.1%	85.4%
		Contractors		92.4%	103.0%	85.6%
		Total		75.6% (14.5 days)	78.8% (14.8 days)	81.1% (15.2 days)

KPI <span>TC</span>	Target (Target year)	Subcategory		Fiscal 2021	Fiscal 2022	Fiscal 2023
Gender-based wage disparity <sup>*1</sup>	—	All employees		—	58.7%	58.1%
Occupational category and employment type change data by gender	—	Occupational category change	Career track employee (Assigned to any region) ↓ Career track employee (Metropolitan area only)	—	—	—
			Career track employee (Metropolitan area only) ↓ Career track employee (Assigned to any region)	—	1 (woman)	—
			Career track employee (Assigned to any region) ↓ Administrative employee	—	—	—
			Career track employee (Metropolitan area only) ↓ Administrative employee	—	—	—
			Employment type change	1 (woman)	—	—
		Total		1	1	—
Re-employment and mid-career employment data by gender	—	Women		4	10	10
		Men		24	41	40
		Total		28	51	50
Training expenses <sup>*2</sup>	—	All employees		¥51.0 million	¥70.9 million	¥113.2 million
Training expenses per employee <sup>*2</sup>	—			¥55,000	¥74,000	¥109,000
Training hours per employee	—			22.5 hours	46.5 hours	49.1 hours
Diversity training data	—	Number of e-learning programs		3	5	1
Career Challenge Program internal recruitment system data	—	Number of relocations		13	18	19
Employee engagement index <sup>*3</sup>	Maintain and improve ratio of positive responses in employee engagement index (fiscal 2027)	All employees (Excluding dispatched employees and individuals seconded from other companies)		*3	—	53.2 <sup>*3</sup>

\*1 Supplementary explanation regarding gender-based wage disparity

• There are no differences in the wage frameworks or systems between men and women.

• The Company sets different wage levels based on the career courses and qualifications of employees. There is a difference in the numbers of men and women in terms of the courses and qualifications, which creates a disparity in wage levels between genders.

\*2 Figures for training expenses and training expenses per employee include venue rental expenses and transportation expenses.

\*3 The engagement index has been measured using the Motivation Cloud service provided by Link and Motivation Inc. since fiscal 2023 and is represented as a deviation value from a nationwide average of 50. In fiscal 2021, a 63% rate of positive responses was received based on measurements in a survey conducted by a different company.

## Environmentally and Socially Minded Financing and Investing

### Policy

#### Tokyo Century Group Environmental and Social Management Policy for Financing and Investment Activity

The Tokyo Century Group (the “Group”) strives to exercise its Management Philosophy of contributing to the creation of an environmentally sound, sustainable economy and society and seeks to continuously improve its corporate value by resolving social issues. To pursue these initiatives, we established this Tokyo Century Group Environmental and Social Management Policy for Financing and Investment Activity. This policy states restrictions on financing and investment in businesses that have significant adverse impacts on the environment and society, based on the Group’s Basic Environmental Policy and Human Rights Policy.

We consider adverse impacts on the environment and society generated from the Group’s business activity as risks and recognize them as important management issues to address sincerely going forward. With due consideration of various stakeholders’ perspectives, this policy was established by a resolution of the Board of Directors of Tokyo Century Corporation (the “Company”).

For more information on the Policy, please refer to the following website.

<https://www.tokyocentury.co.jp/en/sustainability/esg/environment/environmental-and-social-management-policy.html>

## Engagement with Shareholders, Investors, and Customers

### Basic IR Policy

Tokyo Century pays due respect to the spirit and intent of its Management Philosophy and Corporate Code of Conduct, as well as adhering to the Tokyo Stock Exchange’s Corporate Governance Code, and appropriately discloses information in accordance with laws and regulations, develops fair and sound relationships with various stakeholders while promoting dialogue with shareholders and investors, and has established its Basic IR Policy to further enhance its long-term corporate value.

The Basic IR Policy describes the aforementioned objectives while also containing provisions on the scope of information disclosure; the information disclosure system; basic principles for information disclosure and dialogue with shareholders, investors, and other stakeholders; methods of information disclosure; dialogue with shareholders, investors, and other stakeholders; and the handling of insider information and other matters.

For more information on the Basic IR Policy, please refer to the following website.

<https://www.tokyocentury.co.jp/en/ir/ir-policy/>

### Shareholder returns

In principle, the Company issues dividend payments twice a year in the form of an interim and year-end dividend.

Tokyo Century’s basic dividend policy is to provide stable, long-term returns to shareholders, and we are pursuing increases in the payout ratio founded on continuous earnings growth.

#### Dividends per Share

Fiscal years	Fiscal 2017	Fiscal 2018	Fiscal 2019	Fiscal 2020	Fiscal 2021	Fiscal 2022	Fiscal 2023*
Annual dividend	¥114	¥124	¥136	¥138	¥143	¥143	¥52
Payout ratio	23.5%	25.1%	25.9%	34.2%	34.7%	367.1%	35.3%

\* Effective January 1, 2024, the Company conducted a four-for-one stock split of its common shares.

### Communication activities

Tokyo Century advances its investor relations (IR) activities with a focus on generating a cycle of proactive dialogue with shareholders and other investors and communicating the input and requests solicited thereby to management and employees. The input gained during the course of IR activities is used to improve information disclosure and respond to management issues in order to build trust with shareholders and other investors as well as to ensure that capital markets accurately appraise the Company, which in turn is anticipated to contribute to higher corporate value over the medium to long term.

#### Major IR Activities

	Activities	Frequency in Fiscal 2023	Details
Analysts and institutional investors	Earnings calls	4 times	Quarterly earnings calls (Three-month and nine-month calls led by the officer responsible for IR; six-month and full-year briefings led by the president)
	Individual meetings	260 times	Meetings with analysts and institutional investors in Japan and overseas (Of which, approx. 60 meetings with overseas institutional investors)
	Investor briefings	4 times	Investor briefings led by the president and the officer responsible for IR
	Business strategy briefings	1 time	Business strategy briefings for institutional investors in Japan and overseas
	Overseas roadshows	2 times	Face-to-face meetings between the president and IR representatives and overseas institutional investors
Private investors	Company briefings	1 time	Briefings on the Company, business strategies, shareholder return policies, etc.

Customers	Our Action Guidelines (customer trust)	<p>The following provisions related to customer trust can be found in Our Action Guidelines.</p> <p><b>Our Action Guidelines</b></p> <ul style="list-style-type: none"> <li>• <b>We will continue creating solutions that earn customer trust and recognition.</b> We will strive to resolve the issues faced by our customers by harnessing our high level of expertise and foresight to provide optimal products and services that earn their trust and recognition.</li> <li>• <b>We will stringently manage personal information and customer information.</b> We will stringently manage the personal information and customer information we obtain through our operations to prevent leakage outside the Company and use for unintended purposes.</li> </ul>
	Solicitation Policy for Financial Products	<p><b>Solicitation Policy for Financial Products</b></p> <p><b>1. Legal Compliance</b> We will comply with social norms and with laws and regulations, including those governing the sale of financial products and the Consumer Contract Act, and appropriately conduct business operations that satisfy our customers.</p> <p><b>2. Proper Solicitation</b> We will recommend appropriate financial products for customers based on their knowledge, experience, purpose of purchase (investment), financial condition, and other considerations. When explaining our products, we will endeavor to do so at a time and place and in a manner convenient for our customers.</p> <p><b>3. Explanation of Important Matters</b> We will make every effort to provide explanations that enable our customers to fully understand important matters, such as the nature of the product and associated risks, so that they can exercise their own judgment regarding the transaction.</p> <p><b>4. Protection of Privacy</b> We will properly and strictly manage information related to our customers.</p> <p><b>5. Education and Training</b> Our employees will strive to acquire and improve their knowledge and skills so as not to fall short of the trust and expectations of our customers.</p> <p>This is our solicitation policy based on Japan's Act on Provision of Financial Services and the Development of the Accessible Environment Thereto (provisional English law title).</p>
	Responsibilities to customers	<p><b>Responsibilities to Customers</b></p> <p><b>1. Policies and Basic Concept</b> The Tokyo Century Group, which is engaged in corporate activities centering on financial services business in many regions around the world, believes that resolving social and ethical issues through its business activities will maintain sustainability and lead to further growth.</p> <p>We will fulfill our responsibilities to customers under the Group's Management Policy, which stipulates that "We will provide the best products and services around the world to contribute to the success of our customers' businesses while pursuing all possibilities by collaborating with customers and uniting the overall strengths of the Group." We will also further improve our management system and conduct education and training programs based on the Corporate Code of Conduct, Our Action Guidelines, and Solicitation Policy to provide the best possible products and services that satisfy our customers.</p> <p>Due to the nature of the leasing business, the Tokyo Century Group's transactions are mainly with corporate customers. With regard to products and services directly provided to consumers, such as individual auto leasing and individual car rentals, we comply with the laws, regulations, and quality standards related to safety and strive to continuously improve safety and quality. In the unlikely event that a quality problem should arise with a product or service that the Group provides, we will act promptly to identify the cause and prevent a recurrence.</p> <p>The Tokyo Century Group advocates sustainability management and will fulfill its responsibilities to customers in accordance with its Management Philosophy and Management Policy.</p>



## 2. Providing Appropriate, High-Quality Products and Services

The Tokyo Century Group complies with all laws and regulations related to the products and services that it handles, and it provides appropriate, high-quality products and services for the success of its customers' businesses.

With regard to the provision of financial products as defined by Japan's Act on Provision of Financial Services and the Development of the Accessible Environment Thereto (provisional English law title), we have established a Solicitation Policy for Financial Products and will act in accordance with this policy.

As for the provision of products and services other than the financial products previously mentioned, we will act in accordance with our Corporate Code of Conduct, which commits us to accurately respond to customer needs with high-quality products and services.

To ensure the proper conduct of such activities as solicitation and contracting of financial products, customer management, and the reliable delivery of products and services and thereby earn customer trust and recognition, we conduct educational and training programs for officers and employees on responsible business activities and compliance through e-learning and other instructional formats.

As an example of a financial product sale, the Tokyo Century Group, as a Type II Financial Instruments Business Operator, offers customers the opportunity to invest in its Japanese-style operating lease projects.

## 3. Responsible Advertising and Marketing

With regard to businesses that directly provide products and services to consumers, such as individual auto leasing and individual car rentals, we are fully aware of the impact that advertising expressions may have on consumers. We give the highest priority to customer confidence and safety and engage in responsible advertising and marketing by fully considering our social responsibilities. Paying due respect to the consumer's standpoint, we use fact-based expressions and never use statements that may mislead consumers about the characteristics or quality of our products and services. We also engage in dialogues with stakeholders to understand the expectations and demands of society and reflect them in our business activities.

## 4. Management System for the Solicitation and Sale of Financial Products

### (1) Internal Management System

The Internal Management Unit monitors, verifies, and provides guidance on the overall day-to-day operations of the financial instruments business to ensure appropriate operations in accordance with the Financial Instruments and Exchange Act, other relevant laws and regulations, and internal rules. This unit also formulates and implements improvement measures as necessary.

The manager responsible for internal management performs it to ensure appropriate operations, such as regular audits to verify that operating activities in the financial instruments business are properly conducted in accordance with laws and regulations and internal rules. Any significant issues identified are appropriately reported to management and the senior manager with overall responsibility for internal management, who has overall responsibility and the authority of the Internal Management Unit.

### (2) Sales Management System

Activities such as solicitation and contracting of financial products and customer management are placed under the guidance and supervision of the sales manager to ensure proper implementation. This manager directs and supervises sales personnel, oversees sales operations in the financial instruments business, and reports to the Management Meeting on matters related to the financial instruments business as necessary.

When providing advertisements and premiums for the financial instruments business, sales personnel will comply with the relevant rules and other regulations, and will be reviewed and approved in advance by the advertising reviewer appointed by the senior manager with overall responsibility for internal management.

### (3) Response to Complaints

When a customer submits a complaint regarding a transaction, officers and employees respond in accordance with the complaint handling procedures. When calling upon a dispute settlement body, they will comply with the rules they stipulate and strive to resolve the dispute in accordance with the complaint handling and mediation procedures.

#### Relevant page

Opinions and Complaints (Japanese only)

<https://www.tokyocentury.co.jp/jp/contact/comment/>

When a complainant requests to be referred to a third-party organization, officers and employees will introduce a dispute settlement body to the complainant and provide information on standard procedures to ensure the final resolution of the complaint.

## 5. Targets and KPIs

The Tokyo Century Group is dedicated to the success of its customers' businesses by accurately responding to their needs with high-quality products and services and thereby forging a solid relationship of trust. Furthermore, the Group conducts employee training programs to continuously provide appropriate, high-quality products and services.

For information on training program attendance, please refer to the following website.

[https://www.tokyocentury.co.jp/en/sustainability/esg/social/responsibilities.html#anc\\_kpi](https://www.tokyocentury.co.jp/en/sustainability/esg/social/responsibilities.html#anc_kpi)