

Aozora Bank Group Basic Policy on Anti-bribery

Based on its mission “to contribute to the development of society through the creation of new value-added financial services”, the Aozora Bank Group (the “Group”) aims to “adapt to a rapidly changing world while remaining a trusted, valued and specialized financial service provider”. The Group believes that in order for a company to fulfill its social responsibility while promoting sustainable growth, it is necessary to earn the trust of its customers and society through high ethical standards. The Group shall observe all applicable laws and regulations in the countries/regions where it conducts business and strive to eliminate any misconduct, including bribery and corruption.

The Group takes the following actions towards the prevention of bribery:

(1) Prohibition of bribery of public officials, etc.

The Group prohibits all officers and employees from giving, offering, or promising improper corporate hospitality, gifts, or other benefits, either directly or indirectly, to public officials, etc. in any country in association with their duties.

(2) Prohibition of offering excessive corporate hospitality and gifts

The Group prohibits all officers and employees from giving or receiving excessive corporate hospitality, gifts, or other benefits beyond socially-acceptable limits, even if permissible under applicable laws and regulations.

(3) Implementing risk assessment on bribery

The Group conducts on-going risk assessment regarding bribery and revises its anti-bribery initiatives based on the results.

(4) Preparation and retention of records

The Group promptly and accurately prepares records regarding the giving and receiving of corporate hospitality and gifts.

(5) Training

The Group provides on-going anti-bribery training to all officers and employees.

(6) Whistle-blower system

The violation of any laws, regulations, or internal rules pertaining to bribery is subject to

reporting under the whistle-blower system. The system is designed to protect employees that make reports in good faith from retaliation by prohibiting adverse dispositions.

(7) Disciplinary procedures

The violation of any laws, regulations, or internal rules pertaining to bribery is subject to disciplinary action, including dismissal.

(8) Monitoring

The Group performs on-going, risk-based monitoring, including internal audits, concerning the operation of the anti-bribery system.